

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

WILLIE MAE MOORE

PLAINTIFF

VS.

CAUSE NO. 4:07CV5-M-B

**WAL-MART STORES, INC.
AND JOHN DOES 1-5**

DEFENDANTS

AND

WAL-MART STORES, INC.

**DEFENDANT/THIRD-PARTY
PLAINTIFF**

V.

**PUBLIC PAY PHONE COMPANY,
ROBERT P. SCHMIDT AND
JOHN DOES A-B**

THIRD-PARTY DEFENDANTS

**POST TRIAL BRIEF IN SUPPORT OF THIRD-PARTY CLAIMS
FOR ATTORNEY'S FEES AND EXPENSES**

Following the trial of the Plaintiff's premises liability action conducted on April 6-8, 2009, Defendant Wal-Mart Stores, Inc. hereby submits its post trial brief in support of its breach of contract claim against Third Party Defendants Public Payphone Company and Robert Schmidt. Defendant submits the jury's verdict in favor of Defendant confirms Wal Mart Stores, Inc. was not negligent in any manner and did not cause the subject incident with Plaintiff. Therefore, Third Party Defendant is obligated under the terms of the contract among these parties to reimburse the attorney's fees and legal expenses Defendant incurred because of the claims filed by Plaintiff arising out of the operation of the subject payphone and its enclosure. In light of the finding that Wal-Mart was not negligent coupled with the defense and indemnity obligations under the contract, Defendant requests this Court enter judgment against Public Payphone Company and Robert Schmidt for full

reimbursement of Defendant's attorney fees and legal expenses under the Third Party claims brought herein.

I. INTRODUCTION

The trial of Plaintiff's premises liability claims was conducted on April 6-8, 2009. After all parties announced ready, presented their evidence and rested the jury returned a verdict for the Defendant. Prior to the trial the Court ruled Defendant's Third Party claims would be bifurcated and after the jury's verdict, the parties agreed to submit the breach of contract claims to the court for consideration. Without waiving its alternative common law indemnity claim or right to trial by jury on such alternative claim, Defendant request the Court fully reimburse it for attorneys fees and expenses which would render the common law indemnity claim moot and streamline the resolution of this dispute to a final judgment without the need for another trial on remaining claims.

A. Wal-Mart's Contract with Public Payphone Company

The contract between Wal Mart and Public Payphone/Robert Schmidt entitled "Public Telephone Placement Agreement" was admitted as Ex. D-1 during the trial. Paragraph 17(b) provides that any dispute among the parties will be governed by California law. California courts have held the law of indemnity is "the obligation resting on one party to make good the loss or damage another has incurred." *Heppler v. J.M. Peters Company, Inc.*, 73 Cal.App. 4th 1265, 1275 (Cal. 1999). "An express indemnity obligation is contractual in nature, permitting great freedom of action to the parties in the establishment of the indemnity arrangements while at the same time subjecting the resulting contractual language to established rules of construction." *Id.* at 1276. In addressing an express indemnity and defense clause in a contract similar to the request herein the Supreme Court of California stated:

The question whether an indemnity agreement covers a given case turns primarily on contractual interpretation, and it is the intent of the parties as expressed in the agreement that should control. When the parties knowingly bargain for the protection at issue, the protection should be afforded.

Rossmoor Sanitation, Inc. v. Pylon, Inc., 532 P.2d 97, 13 Cal.3d 622, 633 (Cal. 1975).

1. Duty to Install, Maintain and Repair

The testimony of store managers from the Indianola Wal-Mart Store confirmed the general policy of Defendant in regard to outside vendors such as Public Pay Phone and Robert Schmidt. In short, Wal-Mart permits outside vendors to install their products or devices, such as public pay phones, in their retail stores in exchange for commissions but relies upon the outside vendor to properly install, maintain and repair their products or devices. Accordingly, the subject contract herein stated that Public Pay Phone/Schmidt shall. . .

- i. Install, collect, and incorporate its pay phone(s) and determine the appropriate enclosure(s) and features to provide pay phone services to the public that are mutually agreed upon;
- ii. Maintain the pay phone(s) enclosure(s) and associated wiring and proper working order and, when notified, will promptly repair such equipment, unless prevented from doing so by events not within its control (weekend/holiday repair service will be based on Provider's determination of Premises Operator's needs.

(Ex. D-1).

In regard to the cost for installation, maintenance or repair, the contract further required that Public Pay Phone/Schmidt "shall install, operate, repair, service and maintain each Public Telephone at each Location at Provider's sole expense and any damage caused by the placement, movement or removal of the Public Telephone shall be the sole responsibility of the provider. *Id.*

The trial testimony of Mr. Schmidt himself confirmed that he and his company bear the sole

responsibility of installation, maintenance and repair of the payphone in the Indianola Wal-Mart that was involved with the claims brought by Plaintiff. The testimony also established that Public Payphone/Schmidt installed the subject phone via one of its contractors, Ed Cutshall, just three or four months before the subject incident. It was also undisputed at trial that Wal Mart relied upon its outside vendor to service the subject payphone and its enclosure and did not have any employees who even know how to repair, collect or service the phone or its enclosure.

2. The Defense and Indemnity Obligation

The contract contained a defense and indemnity obligation in paragraph 5 which specifically addressed the scenario presented by Plaintiff's claims when a claim was filed against Wal Mart arising out of the operation of the subject payphone in its Indianola store. As a premises owner, Wal Mart is aware that it cannot delegate the duty to maintain its premises in a reasonably safe condition under Mississippi law even if it is sued because of an incident involving the product or device of an outside vendor. In order to provide some measure of assurance and protection against expensive claims of the type brought by Plaintiff, Wal Mart routinely requests its outside vendors to provide a legal defense and indemnity to Wal Mart if it is sued because of the outside vendor's product or device. This common practice among retailers and outside vendors is akin to the statutory protection provided to retailers when the retailer is sued in a products liability action alleging a defective product and the retailer is sued merely because it sold the product in the stream of commerce. MISS. CODE ANN § 11-1-63 (Supp. 2002).

The specific defense and indemnity obligation of Public Pay Phone Company and Mr. Schmidt states:

Provider [Public Pay Phone Company and Robert Schmidt] agrees to indemnify,

defend and save Company [Wal-Mart Stores, Inc.] and their respective directors, officers, employees, subsidiaries, affiliates, landlords, agents and contractors (collectively, the "Indemnified Parties") harmless against each and every claim, demand, cause of action, loss, damage, injury, or lawsuit (including all associated attorneys' fees)(collectively, a "Claim"), relating to liability for bodily injury or property damage arising from, or alleged to have arisen from or related to (a) the operation of a Public Telephone provided under this Agreement . . . (c) any breach by Provider [Public Pay Phone and Robert Schmidt] of its obligations hereunder . . . However, this indemnification shall not apply in the event the injury or damage arises out of or is caused by the negligence or willful conduct of any indemnified party. An Indemnified Party may retain counsel and defend such Claim at Provider's [Public Pay Phone and Robert Schmidt's] expense if the indemnified party [Wal-Mart], in its sole discretion, believes that [Public Pay Phone and Robert Schmidt] will or has failed to complied with any of the terms or conditions of this Section 5.

(Ex. D-1).

Two days after Plaintiff's incident with Third Party Defendant's phone enclosure Wal-Mart placed PPC/ Schmidt on written notice to defend and indemnity Wal-Mart for the claim of Willie Mae Moore. (Ex D- 2.). Moreover, after Plaintiff instigated her lawsuit against Wal-Mart Stores, Inc. the legal counsel selected by Wal-Mart provided a second written demand for defense and indemnification to PPC/Schmidt pursuant to the terms of the Agreement. (Ex. D-3).

B. PPC/Schmidt's Reasons for Not Defending Wal Mart

Third-Party Defendants refused to honor either request, which resulted in Wal Mart filing the Third Party Complaint on May 25, 2007. Public Payphone/Schmidt's reason for not providing Wal Mart with a legal defense or indemnity was based on the alleged negligence of Wal Mart for not notifying PPC/Schmidt of the damage or placing warnings around the subject phone and enclosure. In response to these reasons Wal Mart defended these allegations with testimony that none of the managers in the store had prior knowledge of any damage to the phone enclosure and its Customer Service Manager, Sarah Walker, testified that she specifically recalled the agent for Public Pay Phone

came to collect the money from this phone while it was in a damaged condition but did not make the necessary repairs or place warnings itself. Further, all of the witnesses (either called by Defendant, Plaintiff or Third-Party Defendants) affirmed there was absolutely no evidence which even suggested Wal-Mart or any its employees caused any damage to the payphone enclosure prior to the incident with Plaintiff. Likewise, there was no evidence of willful misconduct by Wal-Mart. After extensive deliberations of all the evidence presented, the jury returned a verdict in favor of Wal Mart therefore supporting its defenses that Wal Mart was not negligent in this claim under the contract and should be reimbursed for its attorney fees and legal expenses.

This Court's prior ruling on Defendant's Motion for Summary Judgment considered the request for a legal defense and indemnification but deferred final adjudication of this issue until the jury was afforded the opportunity to hear the evidence and render a verdict and held:

At any rate, the Court concludes that a final resolution of these issues should properly wait until after the jury has had a chance to determine to what extent, if any, fault for Moore's injuries lies with Wal-Mart and/or PPC. The Court will therefore stay Wal-Mart's Motion for Summary Judgment at this juncture but will entertain any motions relating to the issue of attorney's fees and indemnification after the jury has spoken regarding fault for the underlying accident in this case.

Defendant submits that after each party was allowed the opportunity to present all of the evidence at trial, the jury's verdict is confirmation that Defendant Wal Mart was not negligent and did not cause the subject incident with Plaintiff. Therefore, by the express terms of the contract Defendant should be considered an Indemnified Party and entitled to reimbursement of its attorney's fees and legal expenses.

Defendant anticipates Public Payphone/Schmidt will continue their same argument against an award of attorney's fees by claiming Wal-Mart was somehow negligent despite the jury's verdict.

Third-Party Defendants have relied on an alleged condition precedent of sorts in the Contract which states that “indemnification shall not apply in the event the injury or damage arises out of or is caused by the negligence or willful misconduct of any indemnified party.”

Nonetheless, Public Payphone and Mr Schmidt were afforded the same opportunity to submit evidence during the trial and repeatedly alleged that Wal-Mart was negligent because its associates had knowledge of damage to the phone enclosure prior to Plaintiff’s incident. Upon careful deliberation of such evidence and the defenses asserted by Wal Mart, the jury found that Wal-Mart was not negligent in this case. Therefore, pursuant to the Court’s ruling in the Motion for Summary Judgment and the contract, Wal-Mart is an indemnified party entitled to indemnification from PPC and/or Mr. Schmidt. Since it has been established by the jury that Wal-Mart is not negligent, and there is no suggestion of evidence that Wal Mart willfully caused the incident with Plaintiff, Defendant is entitled to full reimbursement of attorneys fees pursuant to the Contract.

C. Attorney’s Fees for Prevailing Party

The subject Contract also provides for reimbursement of attorney’s fees and legal expenses in the event of a legal proceeding between Wal-Mart and Public Pay Phone/Schmidt such as the Third-Party claim herein in paragraph 17 which states:

In the event of any legal proceeding of any kind between the parties hereto arising out of or relating to this Agreement, whether at law or in equity, including (without limitation), any arbitration, the prevailing party will be entitled to recover its actual cost (including all court and arbitration costs) and actual attorneys fees, in addition to any other relief to which such party may be entitled.¹

(Ex. D-1).

¹The Third-Parties herein submitted their dispute in regard to the defense and indemnity obligations to this Court pursuant to the Third-Party claims and relief requested therein rather than proceed to arbitration.

Defendant Wal-Mart exercised its right to select its own legal counsel under paragraph 5 and incurred significant legal fees and defense cost for the claim brought by Plaintiff and the third-party claim. The updated affidavit of defense counsel, attached hereto as Ex. D-6, establishes the current attorney's fees incurred by Wal Mart through April 27, 2009 total \$54,976.00 with an additional \$6,037.29 in legal costs or expenses.² In order to confirm a set amount of damages for its Third Party breach of contract claim, Wal Mart stipulates its damages for this claim through April 27, 2009 total \$61,013.29. However, in the event of further proceedings of a trial on the common law indemnity claim or an appeal by any party, Wal Mart reserves its right to supplement its damages with an updated amount of fees and expenses.

II. REASONABLENESS OF ATTORNEY'S FEES

Defendant recognizes an award of attorney's fees also involves the court's consideration of the reasonableness of such fees. Defendant submits the fees and expenses incurred in this case were reasonable as shown by the detailed billing statements submitted by defense counsel showing a reasonable legal rate charged per hour as well as reasonable amount of time expended for the various legal work performed under the lodestar calculation method. (Ex. D-6). Defendant also submits the actually amount of legal fees incurred for this case demonstrates the reasons why retailers such as Wal Mart routinely require outside vendors to defend and indemnify them in the event the retailer is sued because of a claim involving the outside vendor's product or device. Upon consideration of the factors below and a comparison of similar decisions which affirmed an award of attorney's fees much higher than incurred herein, Defendant submits there is substantial evidence of the

²Attached hereto is the updated Exhibit D-6 which Defendant offers in support of its request for attorneys fees and details the legal work performed from the date of tender through April 27, 2009.

reasonableness of the fees requested.

Federal courts have set out several factors to be considered when determining whether attorney's fees are reasonable according to the lodestar method of calculating fees adopted by the United States Supreme Court. After calculation of the lodestar amount the Court may consider other factors as set forth in the decision of *Johnson v. Georgia Highway Express, Inc.* 488 F. 2d 714 (5th Cir. 1974). Mississippi courts have also adopted these guidelines when considering the reasonableness of an award of attorney's fees and conduct a similar analysis with the Federal Courts as well as guidelines from Rule 1.5 of the *Mississippi Rules of Professional Conduct*. *In re Gillies*, 830 So.2d 640, 645 (Miss. 2002). While all of the factors are not applicable to the case at bar, they are listed in their entirety below:

- (1) The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service;
- (2) The likelihood, if apparent to the client, the acceptance of the particular employment will preclude other employment by the lawyer;
- (3) The fee customarily charged in the locality for similar legal services;
- (4) The amount involved and the results obtained;
- (5) The time limitations imposed by the client or by the circumstances;
- (6) The nature and length of the professional relationship with the client;
- (7) The experience, reputation and ability of the lawyer or lawyers performing the services; and
- (8) Whether the fee is fixed or contingent.

Id. See McKee v. McKee, 418 So.2d 764 (Miss. 1982); *Mabus v. Mabus*, 910 So.2d 486 (Miss. 2005).

Plaintiff's lawsuit was filed on December 11, 2006 and has been in litigation for well over two (2) years. Promptly after receipt of the lawsuit, defense counsel sent written notice of the tender of defense and expectation of indemnification. (Ex. D-3). Over the course of the years, the case has required the assistance of associate attorneys and paralegals in addition to the lead attorney. The

pleadings index for Defendant indicates nearly eighty (80) separate entries which included items such as the Motion for Leave to File Third-Party Complaint, Motion to Transfer Venue, Third-Party Defendants' Motion to Dismiss, Defendant's Motion for Summary Judgment and even a "Motion for Declaratory Judgment" filed by Third-Party Defendants, among other pleadings. This case involved extensive discovery and traveling expenses such as the corporate deposition of Third-Party Defendant in New Orleans and depositions in Batesville, Oxford, Indianola and Greenville. Additionally, the original trial setting of this matter was continued twice and this dispute was eventually tried over the course of three days. The parties also engaged in a mediation and a separate settlement conference with the Magistrate Judge.

Defendant also believes the amount of fees involved and the outcome of the case constitute a reasonable correlation. Wal-Mart received a favorable ruling from the jury finding that it was not negligent and therefore not liable to Plaintiff for any amount of damage sustained. Considering the third factor, defense counsel charged Wal-Mart a reasonable rate per hour of \$140.00, and charges this same customary rate for Defendant's cases throughout the Northern District of Mississippi. Considering the sixth factor, defense counsel retains a long business relationship with Wal-Mart whereby the undersigned counsel routinely represents Wal-Mart in cases involving personal injuries in one of its stores. Seventh, defense counsel has a fairly substantial amount of experience in handling personal injury cases in this area, particularly premises liability actions, and has tried dozens of such cases. Finally, counsel charged Wal-Mart a fixed rate, agreed upon by Wal-Mart, for the legal services rendered. *Id.*

While some of the factors for consideration are not applicable, Defendant submits the overall amount of the attorneys fees requested herein are reasonable and comply with judicial precedent

cited above. Another unwritten factor which illustrates the reasonableness of the attorney's fees incurred by Defendant in this litigation is a comparison to similar awards affirmed by our appellate courts.

In *Raines v. Bottrell Ins. Agency, Inc.*, the Mississippi Supreme Court upheld an attorneys fee award in the amount of \$138,867.65 for a breach of contract claim against a former insurance agent who violated a covenant not to compete. *Raines v. Bottrell Insurance Agency, Inc.*, 992 So.2d 642 (Miss. 2008). Similarly, in *Microtek Medical, Inc. v. 3M Company*, the Mississippi Supreme Court upheld an attorneys fee award in the amount of \$223,031.09 base on a standard rate of \$240.00 per hour in an indemnity action arising out of an allegedly defective product. *Microtek Medical, Inc. v. 3M Company*, 942 So.2d 122 (Miss. 2006). Even though the *Microtek* decision was modified on a separate legal issue, the attorneys fee award, which essentially quadruples the amount requested by Wal-Mart herein on a matter which was decided via Summary Judgment, was affirmed.

III. CONCLUSION

Pursuant to the terms of the contract among Defendant Wal-Mart Stores, Inc. and Third-Party Defendants Public Pay Phone/Schmidt, coupled with the jury's finding that Wal-Mart was not negligent for the claims brought by Plaintiff, Defendant is entitled to full reimbursement of its attorneys fees and legal expenses incurred herein. Additionally, pursuant to paragraph 17 of the Contract, Defendant is likewise entitled to full reimbursement of its attorneys fees and legal costs expended in defense of the claims brought by Plaintiff and the cost of prosecuting the third-party claims. In light of the various factors for consideration Defendant also submits that the total amount of fees requested is reasonable and consistent with attorneys fees awards upheld by our Appellate Courts. Accordingly, Defendant Wal-Mart hereby requests judgment of this Court against Third-

Party Defendants Public Pay Phone Company and Robert Schmidt, jointly and severally in the amount of \$54,976.00 for attorneys fees and \$6,037.29 for legal expenses through April 27, 2009 but reserves the right to request additional attorneys fees and expenses in the future if there is additional litigation of this matter or an appeal.

RESPECTFULLY SUBMITTED this the 27th day of April 2009.

WAL-MART STORES, INC.

By: /s/R. Brittain Virden

R. BRITTAIN VIRDEN, MBN 10022

RENETHA L. FRIESEN, MBN 103005

Attorneys for Defendant

OF COUNSEL:

R. Brittain Virden

Renetha L. Frieson

CAMPBELL DeLONG, LLP

923 Washington Avenue

Post Office Box 1856

Greenville, MS 38702-1856

Telephone: (662) 335-6011

Facsimile: (662) 334-6407

CERTIFICATE OF SERVICE

I, R. Brittain Virden, attorney for Defendant herein, do hereby certify that on April 27, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECH system, which will send notification of such filing to the following: Arnold D. Lee, Esq. (alee@lee-hughes.com) Leo Carmody, Jr., Esq. (lcarmody@rbisf.com) and Edward J. Currie, Jr., Esq. (ecurrie@curriejohnson.com).

/s/R. Brittain Virden

R. BRITTAIN VIRDEN

RENETHA L. FRIESON

**Attorneys For Defendant Wal-Mart
Stores, Inc.**

CAMPBELL DeLONG,LLP

923 Washington Avenue (38701)

Post Office Box 1856

Greenville, MS 38702-1856

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bvirden@campbelldelongllp.com

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THIRD-PARTY DEFENDANTS

AFFIDAVIT OF R. BRITTAIN VIRDEN

STATE OF MISSISSIPPI

COUNTY OF WASHINGTON

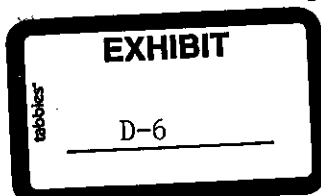
PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for said county and state aforesaid, R. Brittain Virden, who being by me first duly sworn, did depose and say:

1.

My name is R. Brittain Virden, and I am an adult resident citizen of Greenville, Washington County, Mississippi.

2.

I am an attorney and practice with the law firm of Campbell DeLong, LLP, located at 923



Washington Avenue, Greenville, Mississippi, 38701 and have been retained as defense counsel for Wal-Mart Stores, Inc. in Cause No. 4:07CV5-M-B pending before the United States District Court for the Northern District of Mississippi, Greenville Division, which action is styled *Willie Mae Moore v. Wal-Mart Stores, Inc., et. al.*

3.

On behalf of Wal-Mart Stores, Inc. I have submitted correspondence to Third-Party Defendants Public Pay Phone Company and Robert P. Schmidt on or about January 22, 2007. A true and correct copy of that correspondence is attached hereto as Exhibit "1" and incorporated herein by reference which provided written demand for indemnity and legal defense cost to Wal-Mart Stores, Inc. That correspondence followed the previous demand of Wal-Mart Stores, Inc. for a defense and indemnity via written demand dated April 24, 2006, which correspondence is attached hereto as Exhibit "2" and incorporated herein by reference.

4.

Public Pay Phone Company nor Robert P. Schmidt ever acknowledged their obligations and responsibilities for a defense and indemnity to Wal-Mart Stores, Inc. pursuant to the Public Telephone Placement Agreement between the parties. Thereafter Wal-Mart Stores, Inc. filed a Third-Party Complaint against Public Pay Phone Company and Robert P. Schmidt for breach of contract and related relief for defense and indemnity for the underlying lawsuit filed by Willie Mae Moore.

5.

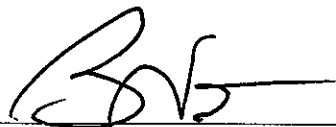
Pursuant to the terms of the Public Telephone Placement Agreement, Wal-Mart Stores, Inc. selected R. Brittain Virden and the law firm of Campbell DeLong, LLP as its defense counsel pursuant to the discretion granted to Wal-Mart for retention of legal counsel under paragraph 5 of

the Agreement.

6.

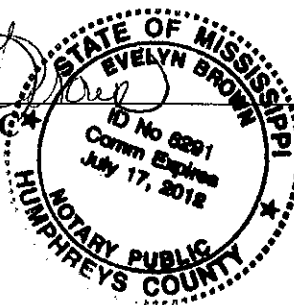
Wal-Mart Stores, Inc. has incurred attorney's fees which total \$54,976.00 through April 27, 2009 in connection with this action. Additionally, Wal-Mart Stores, Inc. has incurred legal expenses totaling \$6,037.29 through April 27, 2009 for a total of \$61,013.29 in fees and expenses. Attached hereto as Exhibit "3" is a true and correct copy of the billing statements and summary of legal fees and expenses incurred by Wal-Mart Stores, Inc. for Campbell DeLong, LLP from the date of the tender to Third-Party Defendants through April 27, 2009.

AND FURTHER, affiant saith not.

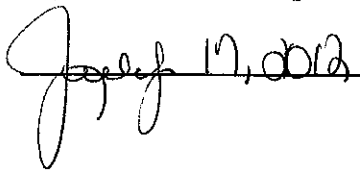


R. BRITTAIN VIRDEN

SWORN TO AND SUBSCRIBED BEFORE ME, this the 27th day of April, 2009.


NOTARY PUBLIC

My Commission Expires:



LAW OFFICES OF
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HAROLD H. MITCHELL, JR.
ROBERT N. WARRINGTON
P. SCOTT PHILLIPS
R. BRITTAIN VIRDEN*
BRADLEY F. HATHAWAY*
FRANK G. POWER
L. DOUGLAS WADE, JR.
CHARLES S. HEWINS
MICHAEL C. GATLING

*ALSO ADMITTED IN ARKANSAS

OF COUNSEL:
J. WALKER STURDIVANT

ROY D. CAMPBELL, JR.
1913-2000
FRED C. DELONG, JR.
1931-1993

January 22, 2007

Mr. Rob Schmidt
Public Pay Phones Company
1034 Raymond Drive
Metairie, LA 70001

RE: Willie Mae Moore v. Wal-Mart Stores, Inc.; United States District Court for the
Northern District of Mississippi, Greenville Division, Cause No.: 4:07cv00005-
MPM-EMB

Dear Mr. Schmidt:

This correspondence will follow my telephone conference with you in regard to the above referenced action. As I explained, Wal-Mart Stores, Inc. has been sued by Willie Mae Moore alleging that a piece of a payphone installed by Public Pay Phone Company fell on her foot. Pursuant to Mississippi law and the Vendor Agreement between Public Pay Phone Company and Wal-Mart Stores, Inc., this correspondence is sent as written notice that Wal-Mart Stores, Inc. demands a defense and/or indemnity from Public Pay Phone Company for all allegations, claims and demands of Plaintiff in the above referenced action. A copy of the lawsuit filed against Wal-Mart Stores, Inc., along with the Notice of Removal, is enclosed for your review.

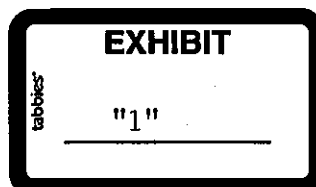
Please convey this request for a defense and indemnity to your insurance carrier and have them contact me directly for this notice. Thank you for your cooperation and assistance.

Sincerely yours,



R. Brittain Virden

RBV:ejb
Enclosures



Claims Management, Inc.

April 24, 2006

Public Pay Phones Company
ATTN: Rob Schmidt
1034 Raymond Dr
Metairie, LA 70001

Willie Moore
131 Aquarius Circle
Indianola, MS 38751
Phone 662-887-7259

RE: Willie Moore
File #: 4951178
Date of Loss: 04/22/2006
Store#: 347

Dear Rob Schmidt:

Claims Management, Inc. is the claims handler for Wal-Mart Stores, Inc., and their insurance carrier concerning customer incidents.

We have been notified of an incident involving a product, which was either manufactured or distributed by your company. The incident as reported is: the claimant was standing by the payphone at the customer service desk when the wooden case fell and a piece of it landed on top of her foot.

At this time, your company is placed on notice of this incident. Please inform your insurance carrier of this matter as soon as possible so that your interests can be protected in the event that a claim is asserted by the claimant.

I would appreciate acknowledgement of this letter and will update you with any new information that becomes available in the future. Thank you for your cooperation.

If you need additional information, please contact me at 479-621-2900+20883.

Thank you for your anticipated cooperation and assistance.

Sincerely,

Linda King
GL Case Manager

Claims Management, Inc.

P. O. Box 8083 - Bentonville, AR 72712-8083
CLAIMS MANAGEMENT, INC. (DBA) CLAIMS MANAGEMENT, INC. OF ARKANSAS
ARKANSAS CLAIMS MANAGEMENT, INC.
PHONE _____ R.FAX _____

EXHIBIT

"2"

	Month to Date	Year to Date	Inception to Date
	Amount	Amount	Amount
Fees	12,577.00	12,913.00	54,976.00
Expenses	558.46	558.46	6,037.29
Surcharge	0.00	0.00	0.00
Taxes	0.00	0.00	0.00
Interest	0.00	0.00	0.00
Total	13,135.46	13,471.46	61,013.29

EXHIBIT

tabbies

"3"

	Type	Bill	Date	Cash / PPD	Fees	Expenses	Surchg/Tax/Int	A/R Balance	Comment
1	Bill	29333	02/08/2007	0.00	2,546.00	357.16	0.00	2,903.16	From bill #29333
2	Cash	29333	02/27/2007	2,903.16	2,546.00	357.16	0.00	0.00	Claims Management, Inc.
3	Bill	29530	03/20/2007	0.00	2,340.00	24.25	0.00	2,364.25	From bill #29530
4	Cash	29530	04/12/2007	2,364.25	2,340.00	24.25	0.00	0.00	Claims Management, Inc.
5	Bill	29763	05/09/2007	0.00	2,101.00	410.00	0.00	2,511.00	From bill #29763
6	Cash	29763	05/29/2007	2,511.00	2,101.00	410.00	0.00	0.00	Claims Management, Inc.
7	Bill	29929	06/19/2007	0.00	1,730.00	157.07	0.00	1,887.07	From bill #29929
8	Cash	29929	07/10/2007	1,887.07	1,730.00	157.07	0.00	0.00	Claims Management, Inc.
9	Bill	30025	07/10/2007	0.00	1,068.00	55.22	0.00	1,123.22	From bill #30025
10	Cash	30025	08/06/2007	1,123.22	1,068.00	55.22	0.00	0.00	Claims Management, Inc.
11	Bill	30181	08/07/2007	0.00	1,396.00	8.32	0.00	1,404.32	From bill #30181
12	Cash	30181	08/29/2007	1,404.32	1,396.00	8.32	0.00	0.00	Claims Management, Inc.
13	Bill	30339	09/07/2007	0.00	4,846.00	231.96	0.00	5,077.96	From bill #30339
14	Cash	30339	09/28/2007	5,077.96	4,846.00	231.96	0.00	0.00	Claims Management, Inc.
15	Bill	30515	10/15/2007	0.00	1,850.00	421.82	0.00	2,271.82	From bill #30515
16	Cash	30515	11/05/2007	2,271.82	1,850.00	421.82	0.00	0.00	Claims Management, Inc.
17	Bill	30705	11/08/2007	0.00	5,647.00	1,766.31	0.00	7,413.31	From bill #30705
18	Cash	30705	11/26/2007	6,604.11	4,837.80	1,766.31	0.00	809.20	Claims Management, Inc.
19	Adj	30705	12/05/2007	0.00	-809.20	0.00	0.00	0.00	Adjustment for Travel Time per N
20	Bill	30849	12/11/2007	0.00	1,070.00	1,005.99	0.00	2,075.99	From bill #30849
21	Cash	30849	01/03/2008	2,075.99	1,070.00	1,005.99	0.00	0.00	Claims Management, Inc.
22	Bill	31040	01/09/2008	0.00	1,862.00	830.92	0.00	2,692.92	From bill #31040
23	Cash	31040	02/01/2008	2,692.92	1,862.00	830.92	0.00	0.00	Claims Management, Inc.
24	Bill	31124	02/06/2008	0.00	740.00	0.00	0.00	740.00	From bill #31124
25	Cash	31124	02/14/2008	740.00	740.00	0.00	0.00	0.00	Claims Management, Inc.
26	Bill	31283	03/06/2008	0.00	7,065.00	115.05	0.00	7,180.05	From bill #31283
27	Cash	31283	03/24/2008	7,180.05	7,065.00	115.05	0.00	0.00	Claims Management, Inc.
28	Bill	31479	04/22/2008	0.00	4,411.00	20.03	0.00	4,431.03	From bill #31479
29	Bill	31587	05/07/2008	0.00	1,817.00	20.27	0.00	6,268.30	From bill #31587
30	Cash	31479	05/12/2008	4,431.03	4,411.00	20.03	0.00	1,837.27	Claims Management, Inc.
31	Cash	31587	05/27/2008	1,837.27	1,817.00	20.27	0.00	0.00	Claims Management, Inc.
32	Bill	31946	07/09/2008	0.00	152.00	0.00	0.00	152.00	From bill #31946
33	Cash	31946	07/14/2008	152.00	152.00	0.00	0.00	0.00	Claims Management, Inc.
34	Bill	32495	11/11/2008	0.00	1,422.00	54.46	0.00	1,476.46	From bill #32495
35	Cash	32495	12/05/2008	1,476.46	1,422.00	54.46	0.00	0.00	Claims Management, Inc.
36	Bill	33031	02/28/2009	0.00	336.00	0.00	0.00	336.00	From bill #33031
37	Cash	33031	03/12/2009	336.00	336.00	0.00	0.00	0.00	Claims Management, Inc.
38	Bill	33301	04/14/2009	0.00	1,356.00	8.28	0.00	1,364.28	From bill #33301
39	Cash	33301	04/23/2009	1,364.28	1,356.00	8.28	0.00	0.00	Claims Management, Inc.
40	Bill	33383	04/27/2009	0.00	11,221.00	550.18	0.00	11,771.18	From bill #33383
41	Unpost	33383	04/27/2009	0.00	-11,221.00	-550.18	0.00	0.00	Unposted 04/27/2009- original pe
42	Bill	33384	04/27/2009	0.00	11,221.00	550.18	0.00	11,771.18	From bill #33384

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

April 27, 2009

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
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ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 33384 RBV
Our file# 030650 06451
Billing through 04/27/2009

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

04/01/2009	RBV	Receipt and review proposed jury instructions from Third Party Defendant	0.50 hrs.
04/01/2009	RBV	Finalized proposed jury instructions from defendant with correspondence to Judge Mills per local rules	0.50 hrs.
04/01/2009	RBV	Receipt and review Third Party Defendant's Objections to deposition testimony of Plaintiff	0.20 hrs.
04/01/2009	RCS	Telephone call to Sunflower Chancery Clerk to obtain copy of decree granting letters of administration	0.20 hrs.
04/02/2009	RBV	Receipt and review correspondence from court administrator re final attempts settle and reply to all counsel	0.30 hrs.
04/02/2009	RBV	Correspondence to Ms Hamm re status update for upcoming trial	0.20 hrs.
04/02/2009	RBV	Updated Ex "6" with new attorney fee information and expenses with correspondence filing to all parties	0.40 hrs.
04/02/2009	RBV	Prepared Order of Proof for defense and third party claims	1.80 hrs.
04/02/2009	RBV	Receipt and review jury list from federal court	0.70 hrs.

04/02/2009	RCS	Updated attorney's fees exhibit for trial	0.30 hrs.
04/03/2009	RBV	Outlined cross-examination of witness Cutshall	2.10 hrs.
04/03/2009	RBV	Travel to Indianola for pretrial interviews with witnesses Fulton, Walker and Johnson	0.70 hrs.
04/03/2009	RBV	Reviewed elements necessary to prove reasonableness of attorney fee award	0.40 hrs.
04/03/2009	RBV	Conducted pretrial preparations and review with employee witnesses Walker, Fulton and Johnson	3.40 hrs.
04/03/2009	RBV	Return travel to Greenville	0.70 hrs.
04/03/2009	RBV	Receipt and review correspondence from Mr Smith with revised settlement update	0.10 hrs.
04/03/2009	RBV	Receipt and review last minute designation deposition testimony from plaintiff's counsel	0.20 hrs.
04/05/2009	RBV	Review depositions of Robert Schmidt and Ed Cutshall for cross-examination outlines	2.60 hrs.
04/05/2009	RBV	Final trial preparations voir dire examinations and revisions to opening statements	2.80 hrs.
04/06/2009	RBV	Travel to Oxford for trial	2.80 hrs.
04/06/2009	RBV	Attended first day of trial	7.20 hrs.
04/06/2009	RBV	Further witness preparations and review of cross-examination based on court rulings	2.10 hrs.
04/07/2009	RBV	Attended second day of trial	8.80 hrs.
04/07/2009	RBV	Finalized Closing Argument	0.90 hrs.
04/08/2009	RBV	Attended third day of trial with verdict for defendant	9.50 hrs.
04/08/2009	RBV	Return travel to Greenville with report to Mr Smith in route	2.80 hrs.

04/09/2009	RBV	Correspondence to counsel for Payphone re subpoena and witness fees under rules	0.20 hrs.
04/09/2009	RBV	Receipt and review correspondence from third party counsel with agreed order on briefing schedule for remaining claims	0.20 hrs.
04/09/2009	RBV	Receipt and review signed order re post trial motions re attorney fees	0.10 hrs.
04/13/2009	RBV	Instructions to RLF to draft post trial brief on attorney's fees reimbursement per Judge Mills request	1.00 hrs.
04/13/2009	RLF	Reviewing file in preparation to draft post trial brief.	2.20 hrs.
04/14/2009	RLF	Prepared draft of Post Trial Brief.	2.70 hrs.
04/14/2009	RLF	Researching case law for factors used in determining the reasonableness of attorney's fees in preparation to draft post trial brief.	1.60 hrs.
04/13/2009	RLF	Outlined trial brief concerning indemnification and other fees.	1.80 hrs.
04/14/2009	RLF	Revising Post Trial Brief.	1.70 hrs.
04/14/2009	RLF	Working on post trial brief with RBV and receiving suggestion to include additional legal support.	0.30 hrs.
04/14/2009	RLF	Researching the legal definition of "defend" for incorporation in to post trial brief.	0.50 hrs.
04/15/2009	RBV	Working with RLF on post trial motion for attorney's fees to define legal term of "defense" under contract	0.30 hrs.
04/15/2009	RBV	Receipt and review notices and minute entries from Judge Mills and clerk confirming jury and verdict	0.20 hrs.
04/16/2009	RBV	Receipt and review notice from clerk with entries of witnesses, exhibits and trial docket	0.20 hrs.

04/16/2009	RBV	Receipt and review additional clerk filings, verdict form and jury instructions	0.20 hrs.
04/16/2009	RBV	Review federal court regulations and lodestar factors on award of attorney fees and analysis of reasonableness	1.20 hrs.
04/16/2009	RLF	Final draft of post trial brief.	1.90 hrs.
04/17/2009	RBV	Revised post trial brief for attorney's fees drafted by RLF	1.30 hrs.
04/20/2009	RBV	Further instructions to RLF to supplement post-trial brief on jurisdictional issues of contract enforcement	0.30 hrs.
04/20/2009	RLF	Researching Mississippi case law concerning court's jurisdiction re: contracts and incorporated into brief.	1.60 hrs.
04/21/2009	RBV	Incorporated new case law and argument in post-trial brief re defense, indemnity and freedom of contract	3.30 hrs.
04/21/2009	RBV	Updated affidavit for authentication of attorney's fees and expenses with new billing statement detail	0.80 hrs.
04/21/2009	RBV	Review Judge Mills prior orders on attorney's fees claims to incorporate into post trial brief	0.40 hrs.
04/22/2009	RBV	Updated brief in support of attorney's fees with appellate support of reasonableness of fees	1.30 hrs.
04/23/2009	RBV	Revised post-trial brief in support of attorney's fees reimbursement	2.90 hrs.
04/27/2009	RBV	Finalized post trial brief for reimbursement of attorney's fees	2.20 hrs.
04/27/2009	RBV	Prepared Certificate of Service post trial brief and correspondence filing	0.20 hrs.
04/27/2009	RBV	Compiled necessary attachments re attorneys' fees and expenses for new exhibit D-6	0.70 hrs.
			\$11,221.00

EXPENSES

030650

Wal-Mart Stores, Inc.

Invoice# 33384

Page 5

04/02/2009	243 Copies at \$.08 a Copy	19.44
04/03/2009	66 Miles to Indianola, MS at the IRS Rate of \$.55 a Mile	36.30
04/05/2009	Long Distance Telephone Call 479-621-2840	6.44
04/05/2009	341 Miles to Oxford, MS at the IRS Rate of \$.55 a Mile	187.55
04/08/2009	Long Distance Telephone Call 662-236-7987	1.84
04/09/2009	Long Distance Telephone Call 601-713-9491	0.92
04/09/2009	Reimbursement for Motel and Meal Expense in Oxford, MS During Trial - 4/6/09 - 4/8/09	294.25
04/17/2009	43 Copies at \$.08 a Copy	3.44
		\$550.18

FEE SUMMARY

Virden, Robert B.	68.70 hrs. @	140.00	9,618.00
Frieson, Renetha L.	14.30 hrs. @	110.00	1,573.00
Satterfield, Regina C.	0.50 hrs. @	60.00	30.00
	83.50		\$11,221.00

Billing Summary

Total professional services	\$11,221.00
Total expenses incurred	\$550.18

Total of new charges for this invoice	\$11,771.18

Total balance now due	\$11,771.18

April 14, 2009

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
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Data Cert
ELECTRONIC BILLING

Invoice# 33301 RBV
Our file# 030650 06451
Billing through 03/31/2009

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

02/04/2009	RBV	Receipt and review correspondence from Ms Hamm re status of settlement and reply	0.10 hrs.
02/04/2009	RBV	Receipt and review correspondence from Ms Hamm re procedures for estate to substitute as party and reply	0.20 hrs.
02/10/2009	RBV	Receipt and review correspondence from Ms Hamm re potential dismissal in light of improper party and reply with analysis	0.20 hrs.
02/23/2009	RCS	Review file materials and prepare draft of case management report	0.80 hrs.
02/25/2009	RBV	Revised Case Management Report draft and update	0.50 hrs.
02/25/2009	RCS	Revise case management report and e-mail to Nancy Hamm transmitting CMR	0.30 hrs.
03/03/2009	RBV	Receipt and review plaintiff's motion to substitute estate as real party in interest and amend pretrial order	0.30 hrs.
03/05/2009	RBV	Receipt and review "Suggestion of Death" filed by counsel for Public Payphone with phone call for questions	0.20 hrs.
03/05/2009	RBV	Telephone conference with counsel for Public Payphone re	0.20 hrs.

potential for settlement after death of plaintiff

03/05/2009	RBV	Telephone call to plaintiff's counsel re new settlement negotiations but rejection	0.20 hrs.
03/23/2009	RBV	Telephone conference with counsel for Public Payphone re lack of estate filing and potential motion to dismiss	0.20 hrs.
03/24/2009	RBV	Review of response to plaintiff's motion to substitute and possible dismissal with RLF	0.20 hrs.
03/24/2009	RBV	Receipt and review correspondence from counsel for Public Payphone re objections to substituted party	0.20 hrs.
03/24/2009	RBV	Report from paralegal re nonfiling of estate and correspondence to counsel for Public Payphone re potential dismissal	0.20 hrs.
03/24/2009	RLF	Drafting Objection to Plaintiff's Motion to Substitute Party and Motion to Dismiss.	0.80 hrs.
03/24/2009	RCS	Telephone call to Sunflower Co. Chancery Clerk re estate of Willie Mae Moore	0.20 hrs.
03/25/2009	RBV	Prepared Certificate of Service response in opposition to motion to substitute and correspondence to clerk	0.20 hrs.
03/25/2009	RBV	Revised response to motion to substitute parties	0.30 hrs.
03/27/2009	RBV	Receipt and review Plaintiffs' rebuttal in support of motion to substitute and surprise letters of administration for estate of plaintiff	0.30 hrs.
03/31/2009	RBV	Receipt and review Trial Brief submitted by Public Payphone	0.90 hrs.
03/31/2009	RBV	Telephone conference with Human Resource Manager re employee-witnesses for trial and pretrial preparations	0.30 hrs.
03/31/2009	RBV	Receipt and review correspondence from court administrator with court's standard jury instructions and court room rules	0.50 hrs.

03/31/2009	RBV	Review Plaintiff's deposition to insert objections in light of her death and proffer at upcoming trial	1.80 hrs.
03/31/2009	RBV	Outlined direct examination of employee-witnesses Walker and Fulton	1.50 hrs.
			\$1,356.00

EXPENSES

03/05/2009	Long Distance Telephone Call 662-236-1500	4.60
03/31/2009	Long Distance Telephone Call 601-713-9491	1.38
03/31/2009	Long Distance Telephone Call 601-969-5120	1.38
03/31/2009	Long Distance Telephone Call 662-887-7997	0.92
		\$8.28

FEE SUMMARY

Virden, Robert B.	8.50 hrs. @	140.00	1,190.00
Frieson, Renetha L.	0.80 hrs. @	110.00	88.00
Satterfield, Regina C.	1.30 hrs. @	60.00	78.00
	10.60		\$1,356.00

Billing Summary

Total professional services	\$1,356.00
Total expenses incurred	\$8.28

Total of new charges for this invoice	\$1,364.28

Total balance now due	\$1,364.28

February 28, 2009

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
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Data Cert
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Invoice# 33031 RBV
Our file# 030650 06451
Billing through 01/31/2009

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

11/21/2008	RBV	Receipt and review correspondence from Ms Kanthak with report on case and new trial status	0.30 hrs.
01/12/2009	RBV	Telephone conference with plaintiff's counsel re attempts to settle prior to pretrial preparations	0.20 hrs.
01/12/2009	RBV	Correspondence to all counsel re efforts to settle third party claims prior to upcoming trial	0.20 hrs.
01/21/2009	RBV	Receipt and review correspondence from counsel for Public Payphone re status of settlement offer	0.10 hrs.
01/22/2009	RBV	Telephone conference with counsel for Public Payphone re final offer of settlement for third party claims	0.20 hrs.
01/22/2009	RBV	Correspondence to Ms Hamm re status and current settlement authority	0.20 hrs.
01/22/2009	RBV	Correspondence from counsel for Public Payphone with confirmation of settlement offer	0.10 hrs.
01/23/2009	RBV	Receipt and review correspondence from Ms Hamm with new settlement authority	0.20 hrs.
01/23/2009	RBV	Correspondence to plaintiff's counsel with conditional	0.20 hrs.

settlement offer

01/27/2009	RBV	Receipt and review correspondence from plaintiff's counsel with counter-offer and reply	0.20 hrs.
01/27/2009	RBV	Receipt and review correspondence from plaintiff's counsel rejecting settlement offer	0.20 hrs.
01/30/2009	RBV	Discovery of Plaintiff's death and report to Mr Smith on status	0.30 hrs.
			\$336.00
<u>FEE SUMMARY</u>			
Virden, Robert B.		2.40 hrs. @ 140.00	336.00
		2.40	\$336.00

Billing Summary

Total professional services	\$336.00

Total of new charges for this invoice	\$336.00

Total balance now due	\$336.00

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

November 11, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
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Data Cert
ELECTRONIC BILLING

Invoice# 32495 RBV
Our file# 030650 06451
Billing through 10/31/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

10/07/2008	RBV	Receipt and review order from Judge Mills denying request for reconsideration of motion for summary judgment	0.40 hrs.
10/15/2008	RBV	Instructions to paralegal for jury list and information re status of trial setting	0.20 hrs.
10/15/2008	RBV	Correspondence to Mr Richard re order denying motion for reconsideration	0.20 hrs.
10/15/2008	RCS	Telephone call to clerk of court requesting jury list	0.20 hrs.
10/15/2008	RCS	Telephone call to court administrator to determine setting for case for 10/27	0.20 hrs.
10/16/2008	RBV	Receipt and review jury list from clerk	0.50 hrs.
10/20/2008	RBV	Review pretrial order, witness list and updated order of proof	1.60 hrs.
10/20/2008	RBV	Correspondence to Manager Watson re anticipated associate-witness necessary for trial	0.20 hrs.
10/20/2008	RBV	Telephone call to Shannon Moore re attendance at trial and location witnesses	0.20 hrs.

030650

Wal-Mart Stores, Inc.

Invoice# 32495

Page 2

10/20/2008	RBV	Telephone conference with plaintiff's counsel renewed settlement negotiations	0.20 hrs.
10/20/2008	RBV	Prepared new Exhibit 6 with correspondence to counsel for Public Payphone for new amount of reimbursement	0.30 hrs.
10/20/2008	RBV	Correspondence to Mr Richard re new settlement demand and evaluation	0.20 hrs.
10/21/2008	RBV	Receipt and review correspondence from Mr Richard re new settlement authority	0.10 hrs.
10/21/2008	RBV	Report to Mr Richard re settlement history for pretrial report	0.30 hrs.
10/21/2008	RBV	Telephone conference with counsel for Third Party Defendant re settlement negotiations	0.30 hrs.
10/21/2008	RBV	Receipt and review correspondence from plaintiff's counsel with final offer of settlement and telephone call to confirm his refusal to negotiate further	0.30 hrs.
10/21/2008	RBV	Receipt and review correspondence from counsel for Third Party and telephone call to confirm a lower settlement offer	0.20 hrs.
10/21/2008	RBV	Correspondence to Mr Richard confirming impasse on settlement and unreasonable demands of plaintiff	0.20 hrs.
10/22/2008	RBV	Telephone call to Plaintiff's counsel re new settlement negotiations	0.30 hrs.
10/22/2008	RBV	Telephone call to counsel for Third Party Defendant re final attempt to settle even case bumped	0.30 hrs.
10/22/2008	RBV	Receipt and review correspondence from court clerk re new trial settings	0.10 hrs.
10/22/2008	RBV	Receipt and review order from Judge Mills resetting trial	0.20 hrs.
10/22/2008	RBV	Correspondence to Shannon Moore re canceled trial and new setting	0.20 hrs.
10/22/2008	RBV	Correspondence to Mr Richard confirming trial	0.20 hrs.

postponement and new setting

10/22/2008	RBV	Correspondence to Manager Watson re notice of new trial and cancelation	0.20 hrs.
10/22/2008	RBV	Prepared opening statement and voir dire examinations	2.20 hrs.
10/22/2008	RBV	Conference call with Judge Mills and all counsel re conflict with criminal setting new trial dates and potential settlement	0.30 hrs.
10/22/2008	RCS	Telephone call to court administrator re trial status	0.20 hrs.
10/27/2008	RBV	Receipt and review service of subpoenas on associates by Third Party Defendant	0.30 hrs.
10/29/2008	RBV	Correspondence to plaintiff's counsel and counsel for Public Payphone due to lack of reply for potential settlement despite continuance	0.20 hrs.
			\$1,422.00

EXPENSES

10/20/2008	Long Distance Telephone Call 662-887-3320	5.52
10/21/2008	54 Copies at \$.08 a Copy	4.32
10/21/2008	Long Distance Telephone Call 601-506-3112	8.28
10/21/2008	Long Distance Telephone Call 601-506-3112	5.06
10/21/2008	Long Distance Telephone Call 601-713-9491	9.20
10/21/2008	Long Distance Telephone Call 601-969-5120	9.20
10/21/2008	Long Distance Telephone Call 601-713-9491	1.38
10/21/2008	Long Distance Telephone Call 601-965-5120	1.38
10/22/2008	Long Distance Telephone Call 601-506-3112	9.20
10/22/2008	Long Distance Telephone Call 662-887-7997	0.92

\$54.46

FEE SUMMARY

Virden, Robert B.	9.90 hrs. @	140.00	1,386.00
Satterfield, Regina C.	0.60 hrs. @	60.00	36.00
	10.50		\$1,422.00

Billing Summary

Total professional services	\$1,422.00
Total expenses incurred	\$54.46

Total of new charges for this invoice	\$1,476.46

Total balance now due	\$1,476.46

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

July 9, 2008

Wal-Mart Stores, Inc.
 ELECTRONIC BILLING
 ELECTRONIC BILLING
 ELECTRONIC BILLING
 Data Cert
 ELECTRONIC BILLING

Invoice# 31946 RBV
 Our file# 030650 06451
 Billing through 06/30/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

05/21/2008	RCS	Review file materials and prepare updated case management report	1.00 hrs.
05/23/2008	RBV	Instructions to paralegal to reset trial with Judge Mills	0.20 hrs.
05/23/2008	RCS	Telephone call to court administrator re new trial date	0.20 hrs.
06/10/2008	RBV	Receipt and review order resetting trial for federal court	0.20 hrs.
06/10/2008	RCS	Telephone call to court administrator re trial date	0.20 hrs.
06/10/2008	RCS	Revise case management report and e-mail same to Clarence Richard and Catherine Kanthak	0.20 hrs.
			\$152.00

FEE SUMMARY

Virden, Robert B.	0.40 hrs. @	140.00	56.00
Satterfield, Regina C.	1.60 hrs. @	60.00	96.00
	2.00		\$152.00

Billing Summary

Total professional services	\$152.00
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Total of new charges for this invoice	\$152.00
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Total balance now due	\$152.00
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CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

May 7, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 31587 RBV
Our file# 030650 06451
Billing through 04/30/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

04/01/2008	RBV	Revised motion for reconsideration for denial of motion for summary judgment	1.30 hrs.
04/01/2008	RBV	Prepared revised verdict form to include Public Payphone and separate allocation of fault with correspondence to Judge Mills	0.90 hrs.
04/01/2008	RBV	Instructions to CSH on research needed for motion to reconsider	0.30 hrs.
04/01/2008	RBV	Report to Mr Richard re denial of motion for summary judgment, related motions and trial status	0.30 hrs.
04/01/2008	RBV	Prepared motion to reconsider denial of motion for summary judgment	1.70 hrs.
04/01/2008	RBV	Report from paralegal re witness interviews and contact with court deputy on potential to be postponed for other trials	0.20 hrs.
04/01/2008	CSH	Instructions from RBV re. filing of motion to reconsider denial of summary judgment motion.	0.20 hrs.
04/01/2008	CSH	Researching federal law re. legal standard for granting motion to reconsider denial of summary judgment; also researching obligation of court vs. obligation of jury to	2.70 hrs.

interpret unambiguous contractual provisions and report to RBV.

04/01/2008	RCS	Telephone call to deputy courtroom clerk re trial - left message	0.10 hrs.
04/01/2008	RCS	Telephone call to Steve Evilsizor re prep for trial	0.20 hrs.
04/02/2008	RBV	Extended telephone conference with counsel for Public Payphone re trial preparations and renewed settlement negotiations	0.40 hrs.
04/02/2008	RBV	Receipt and review correspondence from counsel for Third party with notice to deputy of lack of settlement	0.20 hrs.
04/02/2008	RBV	Outlined voir dire examination	0.60 hrs.
04/02/2008	RCS	Telephone call to courtroom clerk re trial	0.20 hrs.
04/02/2008	RCS	Telephone call to Pearlie Simpson at Store 347 to confirm RBV meeting with associates to prep for trial	0.20 hrs.
04/03/2008	RBV	Prepared order of proof, necessary witnesses and exhibits	0.80 hrs.
04/03/2008	RBV	Prepared direct examination of employee-witness prior to meeting	2.20 hrs.
04/03/2008	RBV	Telephone conference with Court Deputy with notice of continuance due to prior setting	0.20 hrs.
04/03/2008	RBV	Correspondence to Mr Richard with notice of continuance and status	0.20 hrs.
04/03/2008	RBV	Telephone calls to Mr Evilsizor and employee-witnesses re continuance	0.30 hrs.
04/03/2008	RBV	Receipt and review several served witness subpoenas on employee-witnesses by Third Party Defendant	0.30 hrs.
04/04/2008	RBV	Receipt and review Third Party Defendants' response to motion to reconsider	0.50 hrs.
			\$1,817.00

EXPENSES

04/02/2008	197 Copies at \$.08 a Copy	15.76
04/03/2008	Long Distance Telephone Call 662-562-6202	1.87
04/03/2008	Long Distance Telephone Call 662-562-6202	1.10
04/03/2008	Long Distance Telephone Call 662-887-3320	1.54
		\$20.27

FEE SUMMARY

Virden, Robert B.	10.40 hrs. @	140.00	1,456.00
Hewins, Charles S.	2.90 hrs. @	110.00	319.00
Satterfield, Regina C.	0.70 hrs. @	60.00	42.00
	14.00		\$1,817.00

Billing Summary

Total professional services	\$1,817.00
Total expenses incurred	\$20.27

Total of new charges for this invoice	\$1,837.27
Plus net balance forward	\$4,431.03

Total balance now due	\$6,268.30

April 22, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 31479 RBV
Our file# 030650 06451
Billing through 03/31/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

03/05/2008	RBV	Preparations for pretrial conference and potential motions in limine	0.80 hrs.
03/05/2008	RBV	Telephone conference with court administrator to postpone pretrial conference and lack of submission by other parties	0.30 hrs.
03/05/2008	RBV	Receipt and review order from Magistrate Bogen with revised pretrial order requirements	0.20 hrs.
03/05/2008	RBV	Receipt and review response of third party defendant to motion for summary judgment with instructions to CSH for rebuttal	1.80 hrs.
03/05/2008	MSF	Prepared and duplicated trial exhibits.	0.70 hrs.
03/06/2008	CSH	Reviewing Public Pay Phone's response to Wal-Mart's summary judgment motion, including review of legal authorities cited therein.	1.70 hrs.
03/07/2008	RBV	Working with CSH on rebuttal brief in support of motion for summary judgment	0.40 hrs.
03/07/2008	CSH	Draft reply for summary judgment motion.	3.80 hrs.
03/10/2008	RBV	Receipt and review correspondence and draft pretrial order	0.40 hrs.

from Third Party Defendants

03/10/2008	RBV	Prepared revisions to draft pretrial order submission from Third party defendant with correspondence to all counsel	0.70 hrs.
03/10/2008	CSH	Continue drafting rebuttal in support of motion for summary judgment.	2.30 hrs.
03/10/2008	CSH	Conduct legal research specific to issue of Public Pay Phone's reliance on affirmative defenses related to contractual claim of specific performance.	2.50 hrs.
03/11/2008	RBV	Revised rebuttal in support of motion for summary judgment drafted by CSH	1.60 hrs.
03/11/2008	CSH	Completing brief rebuttal in support of motion for summary judgment.	1.80 hrs.
03/12/2008	RBV	Final review and edit to rebuttal in support of motion for summary judgment	0.80 hrs.
03/12/2008	RBV	Prepared Certificate of Service for rebuttal and correspondence to clerk filing	0.20 hrs.
03/13/2008	RBV	Receipt and review correspondence and proposed exhibits from Third Party Defendant with instructions to paralegal to index for trial	0.70 hrs.
03/13/2008	RBV	Receipt and review plaintiff's version of pretrial order with proposed exhibits	0.90 hrs.
03/13/2008	RBV	Revised draft pretrial order with correspondence to all counsel with new objections and revisions	0.80 hrs.
03/13/2008	RBV	Telephone conference with counsel for Third Party Defendant re revisions to pretrial order draft	0.30 hrs.
03/13/2008	MSF	Indexed pre-trial orders from plaintiff and third-party defendant with separate exhibits for trial.	1.20 hrs.
03/14/2008	RBV	Correspondence from plaintiff's counsel with additional revisions to pretrial and reply	0.20 hrs.

03/14/2008	RBV	Receipt and review final version of pretrial order and notice all parties that several items were not revised	0.60 hrs.
03/14/2008	RBV	Receipt and review correspondence to Magistrate Bogen re joint submission of pretrial order	0.20 hrs.
03/14/2008	RBV	Final review and approval of joint pretrial order with correspondence to all counsel to confirm agreement	0.80 hrs.
03/24/2008	RBV	Receipt and review entry from Judge Mills for pretrial order confirmation	0.20 hrs.
03/24/2008	RBV	Receipt and review order denying motion to transfer venue	0.20 hrs.
03/28/2008	RBV	Telephone conference with counsel for Third Party re issue of insurance disclosure to jury, jury instructions and status of trial preparations	0.30 hrs.
03/28/2008	RBV	Receipt and review correspondence from courtroom deputy clerk re jury instructions and courtroom guidelines of Judge Mills	0.90 hrs.
03/28/2008	RBV	Prepared draft jury instructions	2.30 hrs.
03/28/2008	MSF	Telephone call to Clerk to forward a jury list.	0.20 hrs.
03/31/2008	RBV	Revised jury instructions with addition of instructions for third party claims	1.40 hrs.
03/31/2008	RBV	Prepared separate verdict forms for all claims and third party claims	0.40 hrs.
03/31/2008	RBV	Revised jury instructions and verdict forms with correspondence to Judge Mills for filing	0.60 hrs.
03/31/2008	RBV	Receipt and review proposed jury instructions from plaintiff and Third Party Defendant and prepared objections	0.80 hrs.
03/31/2008	RBV	Finalized Defendant's jury instructions	0.70 hrs.
03/31/2008	RBV	Receipt and review jury list from clerk	0.90 hrs.

03/31/2008	RBV	Receipt and review correspondence from counsel for Third Parties with form of verdict	0.20 hrs.
03/31/2008	RBV	Receipt and review order denying motion for summary judgment, motion dismiss, motion for declaratory judgment and related motions	0.50 hrs.
			\$4,411.00

EXPENSES

03/04/2008	62 Copies at \$.08 a Copy	4.96
03/13/2008	22 Copies at \$.08 a Copy	1.76
03/14/2008	78 Copies at \$.08 a Copy	6.24
03/28/2008	Long Distance Telephone Call 601-506-3112	1.87
03/31/2008	65 Copies at \$.08 a Copy	5.20
		\$20.03

FEE SUMMARY

Virden, Robert B.	21.10 hrs. @	140.00	2,954.00
Hewins, Charles S.	12.10 hrs. @	110.00	1,331.00
Flowers, Melanie S.	2.10 hrs. @	60.00	126.00
	35.30		\$4,411.00

Billing Summary

Total professional services	\$4,411.00
Total expenses incurred	\$20.03

Total of new charges for this invoice	\$4,431.03

Total balance now due	\$4,431.03

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

March 6, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 31283 RBV
Our file# 030650 06451
Billing through 02/29/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

02/07/2008	RBV	Telephone conference with counsel for Public Payphone re status settlement from counsel inquiry	0.20 hrs.
02/11/2008	RBV	Instructions to CSH for motion for summary judgment and response to random motions filed by Public Payphone and recent background	0.80 hrs.
02/11/2008	CSH	Receiving instructions from BFH re. filing motion for summary judgment re. indemnity, and responding to like motions from defendant Public Payphone Company.	0.60 hrs.
02/12/2008	CSH	Reviewing Third Party Defendants' Amended Motion for Delaratory Judgment and accompanying memorandum of authorities.	1.00 hrs.
02/12/2008	CSH	Reviewing Third Party Defendants' Amended Motion to Dismiss and accompanying memorandum of authorities.	1.40 hrs.
02/17/2008	CSH	Completing review of Robert Schmidt deposition, for use in drafting motion for summary judgment and responding to third party defendant Public Pay Phone's motions.	1.30 hrs.
02/17/2008	CSH	Reviewing deposition of witness Walker, Moore & Spellfor use in drafting motion for summary judgment and responding to third party defendant Public Pay Phone's motions.	1.70 hrs.

02/18/2008	RBV	Report from CSH on motion for summary judgment and response to random motions filed by Third Party Defendant	0.30 hrs.
02/18/2008	RBV	Researched procedure mechanism of declaratory judgment under federal Act and violation of deadlines by Third Party Defendant	1.80 hrs.
02/18/2008	RBV	Prepared outline of response to Motion for Declaratory Judgment filed by Third Party	1.60 hrs.
02/18/2008	CSH	Reviewing deposition of witness W.E. Cutshall in preparation for drafting motion for summary judgment.	1.60 hrs.
02/18/2008	CSH	Prepared memorandum of authorities in support of motion for summary judgment, detailed discussion of facts, introduction and statement of the law.	5.90 hrs.
02/18/2008	CSH	Researching California law to determine applicable law re. contractual claims for indemnity.	1.60 hrs.
02/18/2008	MSF	Prepare exhibits to Motion for Summary Judgment for RBV.	1.10 hrs.
02/19/2008	RBV	Prepared response in opposition to motion for declaratory judgment filed by Third Party Defendant	1.80 hrs.
02/19/2008	RBV	Prepared draft memorandum of authorities in opposition to motion for declaratory judgment	2.40 hrs.
02/19/2008	RBV	Prepared affidavit of RBV for attorney's fees and written demand in support of summary judgment motion	0.40 hrs.
02/19/2008	RBV	Revised draft motion for summary judgment prepared by CSH	1.30 hrs.
02/19/2008	RBV	Revised defendant's response to Motion for Declaratory Judgment	0.60 hrs.
02/19/2008	CSH	Drafting motion for summary judgment.	0.50 hrs.
02/19/2008	CSH	Completing first draft of memorandum of authorities supporting motion for summary judgment.	2.80 hrs.

02/19/2008	CSH	Proofreading memorandum of authorities prior to submission to RBV.	0.80 hrs.
02/19/2008	CSH	Proofreading motion for summary judgment and accompanying memorandum of authorities prior to submission to RBV for review.	1.20 hrs.
02/19/2008	CSH	Drafting response to motion to dismiss filed by Public Payphone Company.	2.20 hrs.
02/19/2008	MSF	Receive instructions from CSH and RBV concerning attachment of attorneys' fees in motion.	0.10 hrs.
02/19/2008	MSF	Prepare statement of attorneys' fees and expenses to submit as attachment to motion.	0.80 hrs.
02/20/2008	RBV	Review and approval of exhibits necessary for motion for summary judgment	0.80 hrs.
02/20/2008	RBV	Revised memorandum of authorities for response to motion for declaratory judgment	0.80 hrs.
02/20/2008	RBV	Prepared separate filing and certificate of service for response to motion for declaratory judgment	0.20 hrs.
02/20/2008	RBV	Revised memorandum of authorities in support of summary judgment and total amount of damages incurred by client	2.70 hrs.
02/20/2008	RBV	Finalized motion for summary judgment, memorandum and separate certificate of service and filing	0.40 hrs.
02/20/2008	RBV	Revised Response to Motion to Dismiss and Memorandum in Opposition drafted by CSH	0.90 hrs.
02/20/2008	RBV	Final edit to Motion for Summary Judgment and Memorandum in Support	0.40 hrs.
02/20/2008	RBV	Prepared certificate of service for motion and correspondence filing for summary judgment	0.20 hrs.
02/20/2008	CSH	Complete memorandum of authorities in opposition to	3.70 hrs.

Public Payphone's motion to dismiss; then draft response to same.

02/20/2008	MSF	Continue preparing exhibits to Motion for Summary Judgment and scanning exhibits in order to file electronically.	0.90 hrs.
02/20/2008	MSF	Finalized preparing attorney fees and expense statement for attachment to motion.	0.40 hrs.
02/20/2008	MSF	Assist RBV with Response in Opposition to Third Party Defendant's Amended Motion to Dismiss and Memorandum of Authorities in Opposition to Third Party Defendant's Amended Motion to Dismiss.	1.50 hrs.
02/22/2008	RBV	Receipt and review correspondence from counsel for Third Party defendant with new reply and lack of information	0.30 hrs.
02/22/2008	RBV	Receipt and review correspondence from plaintiff's counsel re possible settlement and reply with offer previously made	0.20 hrs.
02/22/2008	RBV	Receipt and review unusual correspondence from counsel for Third Party re alleged new settlement offer and reply	0.40 hrs.
02/26/2008	RBV	Prepared draft pretrial order with proposed exhibits and witnesses for defendant	2.20 hrs.
02/27/2008	RBV	Planned order of proof and necessary witnesses with correspondence to local manager to confirm setting for potential witnesses	0.70 hrs.
02/27/2008	RBV	Incorporated additional exhibits into draft pretrial order with instructions to paralegal to premark and file under local rules	1.10 hrs.
02/27/2008	RBV	Revised pretrial order draft and proposed exhibits	1.30 hrs.
02/27/2008	RBV	Correspondence to all counsel re draft pretrial order and exhibits	0.30 hrs.
02/27/2008	RBV	Review and approval of premarked exhibits compiled by paralegal	0.60 hrs.

02/27/2008	RBV	Receipt and review Reply memorandum from Third Party Defendants on motions to dismiss and for declaratory judgment	0.70 hrs.
02/27/2008	MSF	Begin preparing exhibits for trial according to pre-trial order.	1.80 hrs.
02/27/2008	RCS	Review file materials and prepare draft of case management report	1.70 hrs.
02/28/2008	RBV	Finalized initial draft of pretrial order	0.50 hrs.
02/28/2008	MSF	Continue preparing exhibits for trial.	0.40 hrs.
02/28/2008	RCS	Revise case management report; email same to C. Richard and C. Kanthak	0.40 hrs.
			\$7,065.00

EXPENSES

02/18/2008	360 Copies at \$.08 a Copy	28.80
02/18/2008	10 Copies at \$.80 a Copy	0.80
02/18/2008	194 Copies at \$.08 a Copy	15.52
02/19/2008	50 Copies at \$.08 a Copy	4.00
02/20/2008	32 Copies at \$.08 a Copy	2.56
02/22/2008	Long Distance Telephone Call 601-713-9491	0.33
02/27/2008	268 Copies at \$.08 a Copy	21.44
02/27/2008	110 Copies at \$.08 a Copy	8.80
02/27/2008	22 Copies at \$.08 a Copy	1.76
02/28/2008	160 Copies at \$.08 a Copy	12.80
02/28/2008	228 Copies at \$.08 a Copy	18.24
		\$115.05

FEE SUMMARY

Virden, Robert B.	25.90 hrs. @	140.00	3,626.00
Hewins, Charles S.	26.30 hrs. @	110.00	2,893.00
Satterfield, Regina C.	2.10 hrs. @	60.00	126.00
Flowers, Melanie S.	7.00 hrs. @	60.00	420.00
	61.30		\$7,065.00

Billing Summary

Total professional services	\$7,065.00
Total expenses incurred	\$115.05

Total of new charges for this invoice	\$7,180.05

Total balance now due	\$7,180.05

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

February 6, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 31124 RBV
Our file# 030650 06451
Billing through 01/31/2008

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

01/04/2008	RBV	Receipt and review notice of settlement conference from Magistrate Bogen	0.20 hrs.
01/04/2008	RBV	Correspondence to Mr Richard re settlement conference with Magistrate	0.20 hrs.
01/04/2008	RBV	Telephone conference with APM Moore for attendance at settlement conference	0.20 hrs.
01/04/2008	RCS	E-mail to Shannon Moore re settlement conference	0.10 hrs.
01/04/2008	RCS	E-mail from Mr. Moore re settlement conference	0.10 hrs.
01/09/2008	RBV	Receipt and review correspondence from plaintiff's counsel re settlement conference presentation	0.20 hrs.
01/11/2008	RBV	Receipt and review conditional Offer of Judgment from Third Party Defendant	0.20 hrs.
01/15/2008	RBV	Preparations for settlement conference with Magistrate Bogen	0.40 hrs.
01/15/2008	RBV	To Federal Courthouse and conducted Settlement Conference with Magistrate Bogen, Mr Brown and counsel for all parties	3.20 hrs.

01/15/2008	RBV	Correspondence to Mr Richard re impasse of Settlement Conference	0.20 hrs.
01/15/2008	RBV	Receipt and review entry from federal court re Settlement Conference	0.10 hrs.
01/22/2008	RBV	Telephone conference with plaintiff's counsel re new settlement offer, motions status and pretrial	0.30 hrs.
			\$740.00

FEE SUMMARY

Virden, Robert B.	5.20 hrs. @	140.00	728.00
Satterfield, Regina C.	0.20 hrs. @	60.00	12.00
	5.40		\$740.00

Billing Summary

Total professional services	\$740.00

Total of new charges for this invoice	\$740.00

Total balance now due	\$740.00

January 9, 2008

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 31040 RBV
Our file# 030650 06451
Billing through 12/31/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

12/11/2007	RBV	Correspondence to Mr Richard re settlement recommendation and mediation	0.40 hrs.
12/11/2007	RBV	Receipt and review correspondence from Mr Richard with settlement authority	0.10 hrs.
12/13/2007	RBV	Preparations for mediation	1.40 hrs.
12/13/2007	RBV	Telephone conference with Mr Moore re mediation attendance for Wal Mart and status	0.30 hrs.
12/14/2007	RBV	Pre-mediation meeting and review with Mr Moore	1.20 hrs.
12/14/2007	RBV	Conducted mediation with plaintiff, her counsel, defense counsel and relatives of plaintiff	7.50 hrs.
12/17/2007	RBV	Report to Mr Richard re impasse for settlement, progress of mediation and revised settlement strategy	0.50 hrs.
12/17/2007	RBV	Receipt and review correspondence from Mr Richard re revised settlement authority	0.10 hrs.
12/18/2007	RBV	Correspondence to counsel for Third Party Defendant re deadline for settlement offers	0.20 hrs.

12/19/2007	RBV	Telephone conference with counsel for Public Payphone request to alter settlement offers and deadlines	0.20 hrs.
12/20/2007	RBV	Prepared Certificate of Service for supplemental motion to extend deadlines and correspondence to clerk filing	0.20 hrs.
12/20/2007	RBV	Receipt and review correspondence from counsel for Third party with written agreement for settlement conference	0.10 hrs.
12/20/2007	RBV	Telephone conference with counsel for Third Party Defendant re new agreement for settlement conference with Magistrate Judge	0.20 hrs.
12/20/2007	RBV	Prepared second motion extend deadlines in light of settlement conference with Magistrate	0.40 hrs.
12/26/2007	RBV	Receipt and review correspondence from mediator with reply to confirm split fee payment	0.10 hrs.
12/27/2007	RBV	Receipt and review correspondence from clerk for Judge Mills with request for draft order and preparation of same to extend deadlines	0.30 hrs.
12/27/2007	RBV	Receipt and review Order approving extension from Judge Mills	0.10 hrs.
			\$1,862.00

EXPENSES

12/14/2007	Buck's Restaurant - Lunch During Mediation	54.06
12/18/2007	Long Distance Telephone Call 601-713-9491	0.33
12/20/2007	Long Distance Telephone Call 601-969-5120	0.33
12/27/2007	15 Copies at \$.08 a Copy	1.20
12/27/2007	Whittington, Brock & Swayze, P.A. - 1/3 Mediation	775.00
		\$830.92

FEE SUMMARY

Virden, Robert B.	13.30 hrs. @	140.00	1,862.00
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13.30

\$1,862.00

Billing Summary

Total professional services \$1,862.00

Total expenses incurred \$830.92

Total of new charges for this invoice \$2,692.92

Total balance now due \$2,692.92

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

December 11, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30849 RBV
Our file# 030650 06451
Billing through 11/30/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

11/05/2007	RBV	Receipt and review Third Party Defendant's Motion to Dismiss and Motion for Declaratory Judgment with Memorandum in support of each	1.80 hrs.
11/05/2007	RBV	Telephone conference with counsel for Third Party re agreement postpone response to Motions Dismiss or Declaratory Judgment, mediation and potential early settlement of 3rd Party claims	0.30 hrs.
11/05/2007	RBV	Prepared correspondence to counsel for 3rd Party re postponed responses and settlement offer with supporting documents	0.40 hrs.
11/05/2007	RBV	Receipt and review Order approving extension of deadline to file pretrial and disposition motions	0.20 hrs.
11/06/2007	RBV	Compiled documentation of total defense costs and expenses for mediation and initial offer to Third Party	0.50 hrs.
11/06/2007	RBV	Correspondence to Mr Richard for approval of initial settlement offer prior to mediation	0.20 hrs.
11/06/2007	RBV	Receipt and review confirmation and Rules of Mediation from mediator	0.20 hrs.
11/06/2007	RBV	Correspondence to mediator with executed rules and	0.40 hrs.

background information on Third Party claims

11/19/2007	MSF	Receive and return email from Shannon Moore concerning mediation date and time.	0.20 hrs.
11/21/2007	RBV	Prepared updated case management report, budget and revised settlement recommendation in light of upcoming mediation	1.80 hrs.
11/21/2007	RBV	Review of updated expenses and fees with revised settlement demand to Third Party Defendant	0.40 hrs.
11/26/2007	RBV	Report from paralegal on new setting for mediation due to attendance of insurance representative and new counsel involvement	0.20 hrs.
11/26/2007	RBV	Correspondence to all counsel re new counsel involvement for conflict with Canal insurance	0.20 hrs.
11/26/2007	RBV	Receipt and review correspondence from counsel opposite re conflict with mediation and reply for potential new setting and personal attendance of insurance representative	0.30 hrs.
11/26/2007	RCS	Telephone call to Mediator Swayze re new date for mediation	0.20 hrs.
11/26/2007	RCS	Telephone call to attorney Carmody re change in mediation date	0.20 hrs.
11/26/2007	RCS	Telephone call from attorney Carmody confirming change in date for mediation	0.10 hrs.
11/26/2007	RCS	Telephone call from attorney Lee confirmation of change of date for mediation	0.10 hrs.
11/26/2007	RCS	E-mail to attorney Lee re time for mediation	0.10 hrs.
11/27/2007	RBV	Receipt and review correspondence re new "Moeller" counsel for Defendant Schmidt	0.10 hrs.
11/27/2007	RCS	Preparation of e-mail to Clarence Richard and Catherine Kanthak re mediation	0.10 hrs.

11/27/2007	RCS	Preparation of correspondence to Charlie Swayze confirming change of mediation date	0.20 hrs.
11/27/2007	RCS	Correspondence from Catherine Kanthak confirming change in mediation date	0.10 hrs.
11/30/2007	RCS	Telephone calls to confirm mediation attendance of Shannon Moor	0.20 hrs.
			\$1,070.00

EXPENSES

11/05/2007	128 Copies at \$.08 a Copy	10.24
11/05/2007	42 Copies at \$.08 a Copy	3.36
11/05/2007	Long Distance Telephone Call 6626-236-1500	2.09
11/07/2007	Esquire Deposition Services, LLC - Fee for Deposition of Robert Schmidt	990.30
		\$1,005.99

FEE SUMMARY

Virden, Robert B.	7.00 hrs. @	140.00	980.00
Satterfield, Regina C.	1.30 hrs. @	60.00	78.00
Flowers, Melanie S.	0.20 hrs. @	60.00	12.00
	8.50		\$1,070.00

Billing Summary

Total professional services	\$1,070.00
Total expenses incurred	\$1,005.99

Total of new charges for this invoice	\$2,075.99

Total balance now due	\$2,075.99

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

November 8, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30705 RBV
Our file# 030650 06451
Billing through 10/31/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

09/29/2007	RBV	Compiled exhibits necessary for 30-b-6 deposition of Public Payphone and additional preparations	1.40 hrs.
10/01/2007	RBV	Travel to New Orleans for 30-b-6 deposition of Public Payphone and Mr Schmidt (pro-rata per Guidelines)	3.80 hrs.
10/02/2007	RBV	Additional preparations for depositions of Public Payphone and Mr Schmidt	2.30 hrs.
10/02/2007	RBV	To deposition setting and conducted deposition of Mr Schmidt and Public Payphone	4.50 hrs.
10/02/2007	RBV	Return travel to Greenville (pro-rata)	3.80 hrs.
10/03/2007	RBV	Report to Mr Richard re deposition of Public Payphone Co and Mr Schmidt with status update on dispositive motions	1.20 hrs.
10/04/2007	RBV	Receipt and review correspondence from counsel for Public Payphone re additional documents to produce and response	0.30 hrs.
10/05/2007	RBV	Return travel to Greenville	2.80 hrs.
10/05/2007	RBV	Preparations for deposition of Ed Cutsall and compiled deposition exhibits	1.70 hrs.

10/05/2007	RBV	Travel to Oxford for deposition of Mr Cutshall	2.80 hrs.
10/05/2007	RBV	Conducted deposition of Ed Cutshall	3.50 hrs.
10/15/2007	RBV	Receipt and review correspondence from counsel for plaintiff with questions of potential mediation and report to Mr Richard	0.30 hrs.
10/16/2007	RCS	E-mail to Sheila McKinney re deposition transcripts of Plaintiff and Tracy Cherry	0.10 hrs.
10/17/2007	RBV	Review of summary judgment motion with LDW and instructions for draft motion against Third Party	0.80 hrs.
10/17/2007	RBV	Receipt and review correspondence from Mr Richard with agreement to mediate	0.10 hrs.
10/17/2007	RBV	Correspondence to all counsel re mediation agreement, preliminary issues and conditions	0.30 hrs.
10/17/2007	DW	Research relevant authorities on issues for summary judgment, contractual and common law indemnity. Contemporaneous review of vendor agreement and other file materials.	4.60 hrs.
10/18/2007	RBV	Receipt and review correspondence from all counsel with agreement on mediation and extension of deadlines	0.30 hrs.
10/18/2007	RBV	Instructions to paralegal on mediation and mediator	0.20 hrs.
10/18/2007	DW	Research recent authorities on common law and contractual indemnity.	2.10 hrs.
10/18/2007	MSF	Telephone contact with Charlie Swayze to obtain open dates for mediation.	0.10 hrs.
10/18/2007	MSF	Correspondence to opposite counsel regarding available dates for mediation.	0.20 hrs.
10/19/2007	DW	Research issues related to interpretation of indemnity provisions in provider agreement of public payphones.	2.00 hrs.

10/22/2007	RBV	Instructions to paralegal re firm setting for mediation in light of motion to extend deadlines	0.30 hrs.
10/22/2007	RBV	Prepared motion to extend deadline for filing motions due to mediation	0.80 hrs.
10/22/2007	RBV	Prepared Certificate of Service for Motion to extend deadlines and correspondence filing	0.20 hrs.
10/22/2007	MSF	Telephone calls to Mr. Lee and Mr. Carmody to set mediation date.	0.30 hrs.
10/22/2007	MSF	Receive instructions from RBV regarding mediation setting with responsible parties.	0.20 hrs.
10/22/2007	MSF	Receive instructions from RBV regarding filing deadline extension for Motion for Summary Judgment.	0.20 hrs.
10/22/2007	MSF	Receive calls from Mr. Carmody and Mr. Lee concerning mediation dates.	0.40 hrs.
10/23/2007	MSF	Telephone call to Judge Mill's Clerk to determine if Judge Mills will grant motion to extend deadline.	0.10 hrs.
10/23/2007	MSF	Subsequent telephone conversation with Sally Wilkerson, Judge Mills' Clerk, regarding deadline extension for motion for summary judgment. Telephone call to opposite counsel regarding any objections to deadline extension.	0.30 hrs.
10/24/2007	MSF	Telephone calls to Steve Haynes, Wal-Mart manager and Shannon Moore, Area Asset Protection Manager, concerning availability for mediation.	0.10 hrs.
10/24/2007	MSF	Receive telephone call from Shannon Moore to discuss mediation dates and basis of the case.	0.20 hrs.
10/24/2007	MSF	Research and gather requested pleadings and discovery to send to Shannon Moore prior to mediation.	0.30 hrs.
10/26/2007	RBV	Receipt and review correspondence from law clerk re draft order re motion to extend motions deadline	0.20 hrs.

10/26/2007	RBV	Prepared draft order to approve motion to extend deadlines and correspondence clerk and law clerk for approval/entry	0.30 hrs.
10/26/2007	RBV	Instructions to paralegal re unilateral setting of mediation due to lack of reply from plaintiff	0.20 hrs.
10/26/2007	RBV	Receipt and review entry of appearance for another counsel for Third Party Defendant	0.20 hrs.
10/26/2007	MSF	Telephone call to Sally Wilkerson to obtain decision on Motion to Extend Deadline.	0.10 hrs.
10/26/2007	MSF	Telephone call to Charlie Swayze, Jr. to set mediation in this case for December 12.	0.10 hrs.
10/29/2007	MSF	Telephone call to Charlie Swayze, Jr. to confirm mediation date and provide opposite counsel information.	0.10 hrs.
			\$5,647.00

EXPENSES

10/01/2007	610 Miles to New Orleans, LA at \$.485 a Mile	295.85
10/03/2007	Reimbursement Motel Expense in New Orleans, LA	176.73
10/03/2007	Reimbursement of Meal Expenses re Trip to New Orleans, LA	55.04
10/05/2007	22 Copies at \$.08 a Copy	1.76
10/05/2007	308 Miles Oxford, MS to at \$.485 a Mile	149.38
10/15/2007	Reimbursement of Meal Expense in Grenada, MS	6.89
10/22/2007	Karen C. Reid, Ct. Rpt. - Fee for Deposition of W. E. Cutshall	648.00
10/24/2007	McKinney Court Reporting - Fee for Depositions of Willie Mae Moore and Tracy Cherry Nance	432.55
10/26/2007	Long Distance Telephone Call 662-281-5041	0.11
		\$1,766.31

FEE SUMMARY

Virden, Robert B.	32.30 hrs. @	140.00	4,522.00
Wade Jr., L. Douglas	8.70 hrs. @	110.00	957.00
Satterfield, Regina C.	0.10 hrs. @	60.00	6.00
Flowers, Melanie S.	2.70 hrs. @	60.00	162.00
	43.80		\$5,647.00

Billing Summary

Total professional services	\$5,647.00
Total expenses incurred	\$1,766.31

Total of new charges for this invoice	\$7,413.31

Total balance now due	\$7,413.31

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

October 15, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30515 RBV
Our file# 030650 06451
Billing through 09/30/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

09/05/2007	RCS	Telephone calls to Tracy Cherry re preparation for her deposition	0.20 hrs.
09/05/2007	RCS	Correspondence from attorney Carmody re Metairie depositions	0.10 hrs.
09/06/2007	RBV	Telephone conference with witness Tracy Cherry re deposition preparations and review	0.50 hrs.
09/06/2007	RBV	Preparations for deposition of Plaintiff	1.40 hrs.
09/07/2007	RBV	To office of plaintiff's counsel and conducted deposition of plaintiff and witness Cherry	3.70 hrs.
09/07/2007	RCS	Retrieve photographs from CD produced by Plaintiff	0.30 hrs.
09/10/2007	RBV	Receipt and review interrogatory responses from Third Party Defendant Public Payphone for plaintiff and client	1.50 hrs.
09/10/2007	RBV	Receipt and review additional document production and photographs from plaintiff's counsel	0.70 hrs.
09/10/2007	RBV	Telephone conference with New Orleans counsel re deposition of Public Payphone for indemnity claim	0.20 hrs.

030650 Wal-Mart Stores, Inc.

Invoice# 30515 Page 2

09/10/2007	RCS	Revise 30(b)(6) notice of deposition and notice of deposition for Schmidt	0.20 hrs.
09/10/2007	RCS	Electronically file 30(b)(6) Notice of Deposition for PPC	0.20 hrs.
09/10/2007	RCS	Electronically file Notice of Deposition of Robert Schmidt	0.20 hrs.
09/11/2007	RBV	Receipt and review correspondence from plaintiff's counsel re remaining discovery, potential mediation and reply	0.20 hrs.
09/11/2007	RBV	Review of Public Payphone's document production from requests of client and plaintiff	1.70 hrs.
09/11/2007	RBV	Extended telephone conference with Wal Mart's agent for Telephone Contract, Tiffany with Intera Systems	0.60 hrs.
09/11/2007	RBV	Prepared Memorandum to File re telephone conference and information from Intera Communications	0.20 hrs.
09/17/2007	RBV	Receipt and review correspondence from Mr Richard with reply on status, potential for unilateral settlement and Third Party claims	0.30 hrs.
09/28/2007	RBV	Preparations for 30-b-6 deposition of Public Payphone Co	1.70 hrs.
			\$1,850.00

EXPENSES

09/11/2007	Joyce M. Redmond, Ct. Rptr. - Fee for Copies of Depositions of W. Fulton, F. Johnson, S. Walker and M. Spell	276.00
09/24/2007	Edwards Reporting, Inc. - Deposition of Steve Evilsizor	142.30
09/30/2007	44 Copies at \$.08 a Copy	3.52
		\$421.82

FEE SUMMARY

Virden, Robert B.	12.70 hrs. @	140.00	1,778.00
Satterfield, Regina C.	1.20 hrs. @	60.00	72.00
	13.90		\$1,850.00

030650 Wal-Mart Stores, Inc.

Invoice# 30515

Page 3

Billing Summary

Total professional services	\$1,850.00
Total expenses incurred	\$421.82

Total of new charges for this invoice	\$2,271.82

Total balance now due	\$2,271.82

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

September 7, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30339 RBV
Our file# 030650 06451
Billing through 08/31/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

08/01/2007	RCS	Correspondence to attorney Carmody re schedule for depositions of Store 347 employees and Steve Evilsizor	0.20 hrs.
08/06/2007	RBV	Review of depositions and preparation meetings with paralegal and instructions to set and notice other depositions of 3rd party defendants	0.30 hrs.
08/06/2007	RCS	Telephone calls to attorney Carmody re depositions of Wal-Mart employees	0.20 hrs.
08/06/2007	RCS	Telephone call to attorney Crosthwait's office re location for depositions of Wal-Mart employees	0.10 hrs.
08/06/2007	RCS	Telephone call to Steve Evilsizor re deposition	0.20 hrs.
08/06/2007	RCS	Telephone call Pearlie Simpson at Store 347 re depositions for store employees	0.20 hrs.
08/06/2007	RCS	Preparation of correspondence to Maleah at attorney Crosthwait 's office re depositions	0.20 hrs.
08/06/2007	RCS	Preparation of correspondence to Geanelle Adams re depositions	0.20 hrs.
08/06/2007	RCS	Preparation of correspondence via facsimile to Pearlie	0.30 hrs.

030650

Wal-Mart Stores, Inc.

Invoice# 30339

Page 2

Simpson re schedule for 8/20 depositions and arrangements for 8/17 meetings with RBV and store associates to prepare for depositions

08/06/2007	RCS	Preparation of correspondence to Steve Evilsizor re deposition for 8/21 and preparation meeting with RBV	0.20 hrs.
08/06/2007	RCS	Telephone call to attorney for Plaintiff re Cutshall deposition	0.10 hrs.
08/07/2007	RCS	Telephone calls to attorney for Plaintiff re depositions of Cutshall and Schmidt	0.20 hrs.
08/07/2007	RCS	Complete draft of Defendant's responses to Third Party Defendant's interrogatories and requests for production of documents	0.70 hrs.
08/07/2007	RCS	Compile documents to be produced in response to Third Party Defendant's requests for production of documents	1.50 hrs.
08/07/2007	RCS	Preparation of notice of service of discovery	0.20 hrs.
08/07/2007	RCS	Telephone call to Steve Evilsizor re deposition	0.20 hrs.
08/07/2007	RCS	Telephone call from attorney for Plaintiff re Cutshall and Schmidt deposition.	0.20 hrs.
08/13/2007	RBV	Telephone conference with plaintiff's counsel re deposition of Public Payphone employees	0.20 hrs.
08/14/2007	RBV	Receipt and review notices for depositions of 5 employee-witnesses from Third Party counsel	0.30 hrs.
08/14/2007	RBV	Receipt and review correspondence from counsel for Third Party Defendant re deposition subpoenas for witnesses and reply	0.20 hrs.
08/14/2007	RBV	Approval and execution of deposition notice for Ed Cutsall	0.20 hrs.
08/14/2007	RBV	Working with paralegal on deposition of employees of Public Payphone and draft 30-b-6 deposition	0.40 hrs.
08/14/2007	RBV	Receipt and review correspondence from counsel for	0.10 hrs.

Public Payphone re deposition of Mr Schmidt

08/14/2007	RCS	Voice mail from attorney Carmody	0.10 hrs.
08/14/2007	RCS	Working with RBV re discovery responses and depositions of Cutshall and Schmidt	0.20 hrs.
08/14/2007	RCS	Return telephone call to attorney Carmody re depositions of Cutshall and Schmidt	0.20 hrs.
08/14/2007	RCS	Preparation of notice to take deposition upon oral examination of W. E. Cutshall	0.30 hrs.
08/14/2007	RCS	Correspondence to Karen Reid re Cutshall deposition	0.10 hrs.
08/14/2007	RCS	Draft correspondence to counsel re available dates for deposition of Schmidt	0.20 hrs.
08/14/2007	RCS	Telephone call from attorney Carmody re extension of time on discovery	0.10 hrs.
08/15/2007	RCS	Revise correspondence to attorneys Carmody and Lee and transmit same via facsimile	0.20 hrs.
08/15/2007	RCS	Review of pleadings and preparation of draft of 30(b)(6) deposition notice to Public Payphone Company	1.30 hrs.
08/16/2007	RBV	Revised draft interrogatory responses propounded by Public Payphone	1.30 hrs.
08/16/2007	RBV	Revised responses to Third Party Defendant's request for production and review/approval of documents necessary for production	1.60 hrs.
08/16/2007	RBV	Receipt and review correspondence from counsel for plaintiff and Third Party Defendant re deposition of witness Schmidt	0.20 hrs.
08/16/2007	RBV	Revised draft 30-b-6 notice to Third Party Defendant	0.40 hrs.
08/16/2007	RBV	Correspondence to counsel for Third Party Defendant re draft 30-b-6 notice and designee	0.10 hrs.

08/17/2007	RBV	Return travel to Greenville from Indianola meeting	0.70 hrs.
08/17/2007	RBV	Receipt and review discovery responses of Third Party Defendant to interrogatories and request for production propounded by plaintiff	1.30 hrs.
08/17/2007	RBV	Telephone conference with Mr Evilsisor re recollection of incident, contact with Public Payphone Co and other preparations for deposition	0.50 hrs.
08/17/2007	RBV	Review of file materials for preparations of depositions of employee-witnesses	0.80 hrs.
08/17/2007	RBV	Travel to Indianola for pre-deposition meetings with associates	0.70 hrs.
08/17/2007	RBV	Conducted pre-depositions preparations and review with Manager Fulton, and associates Walker, Spell and Johnson	3.80 hrs.
08/18/2007	RBV	Preperations for depositions of employee-witness	1.60 hrs.
08/20/2007	RBV	Travel to Indianola for depositions of employee-witnesses	0.70 hrs.
08/20/2007	RBV	Attended depositions of Ms Fulton, Mr Johnson, Ms Walker and Mr. Spell	6.70 hrs.
08/20/2007	RBV	Return travel to Greenville with call to Mr Evlisor re his deposition in morning	0.70 hrs.
08/20/2007	RCS	Revise 30(b)(6) deposition notice for Public Payphone	0.20 hrs.
08/20/2007	RCS	E-mail to attorney Carmody re deposition for Schmidt	0.10 hrs.
08/21/2007	RBV	Travel to Senatobia for deposition of Manager Steve Evilsisor (pro-rata per Guidelines)	2.20 hrs.
08/21/2007	RBV	Conducted pre-deposition review and attended deposition of Mr Evilsisor	1.80 hrs.
08/21/2007	RBV	Return travel to Greenville (pro-rata per Guidelines)	2.20 hrs.

08/22/2007	RCS	Preparation of notice of deposition for Robert Schmidt, individually	0.30 hrs.
08/23/2007	RBV	Receipt and review plaintiff's responses to discovery propounded by Public Payphone Company	1.70 hrs.
08/31/2007	RBV	Receipt and review re-notice of deposition of witness Cherry	0.20 hrs.
08/31/2007	RBV	Correspondence to Ms Cherry with new deposition notice, setting and preparations	0.20 hrs.
			\$4,846.00

EXPENSES

08/17/2007	Long Distance Telephone Call 662-562-6202	2.20
08/17/2007	50 Miles to Indianola, MS at \$.485 a Mile	24.25
08/20/2007	50 Miles to Indianola, MS at \$.485 a Mile	24.25
08/20/2007	287 Miles to Senatobia, MS at \$.485 a Mile	139.20
08/21/2007	Reimbursement of Meal Expense in Indianola, MS on 8/17/07	6.52
08/21/2007	Reimbursement of Meal Expense in Indianola, MS on 8/20/07	24.76
08/21/2007	Reimbursement of Meal Expense in Senatobia, MS on 8/21/07	10.78
		\$231.96

FEE SUMMARY

Viriden, Robert B.	31.10 hrs. @	140.00	4,354.00
Satterfield, Regina C.	8.20 hrs. @	60.00	492.00
	39.30		\$4,846.00

Billing Summary

Total professional services	\$4,846.00
Total expenses incurred	\$231.96

Total of new charges for this invoice

\$5,077.96

Total balance now due

\$5,077.96

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

August 7, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30181 RBV
Our file# 030650 06451
Billing through 07/31/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

07/03/2007	RBV	Receipt and review response of opposition to motion to transfer venue from 3rd party defendant	0.30 hrs.
07/09/2007	RCS	Review file materials and prepare draft of case management report	1.60 hrs.
07/09/2007	RCS	Telephone call to attorney for Plaintiff re deposition date	0.20 hrs.
07/10/2007	RBV	Receipt and review plaintiff's rebuttal brief in support of motion to transfer	0.40 hrs.
07/12/2007	RBV	Receipt and review discovery requests of plaintiff to 3rd party defendant	0.30 hrs.
07/12/2007	RBV	Receipt and review correspondence from plaintiff's counsel re depositions of all parties and 30-b-6 of Wal Mart	0.20 hrs.
07/12/2007	RBV	Prepared notice of deposition for plaintiff	0.20 hrs.
07/12/2007	RBV	Prepared Certificate of Service for deposition notice and correspondence filing	0.20 hrs.
07/12/2007	RBV	Correspondence to plaintiff's counsel with issues of employee and 30-b-6 deposition of Wal Mart	0.20 hrs.

030650

Wal-Mart Stores, Inc.

Invoice# 30181

Page 2

07/13/2007	RBV	Revised quarterly case management report to Mr Richard	0.50 hrs.
07/16/2007	RBV	Receipt and review of core document disclosures from 3rd party defendant	1.30 hrs.
07/16/2007	RBV	Receipt and review corporate disclosure statement of 3rd party defendant	0.10 hrs.
07/16/2007	RBV	Receipt and review correspondence from counsel for Public Payhone re deposition of parties and employees	0.20 hrs.
07/16/2007	RBV	Correspondence to all counsel re depositions of Wal Mart employees	0.20 hrs.
07/16/2007	RBV	Correspondence to counsel for 3rd party defendant re notice of demand for defense and contact with their insurance carrier	0.20 hrs.
07/16/2007	RCS	Finalized Case Management Report and e-mail same to Clarence Richard and Catherine Kanthak	0.40 hrs.
07/17/2007	RBV	Instructions to paralegal for responses to discovery	0.20 hrs.
07/17/2007	RBV	Revised correspondence to counsel for 3rd party to confirm written notice of claim for defense/indemnity sent to their insurance carrier	0.30 hrs.
07/17/2007	RBV	Revised discovery propounded to third party defendants	0.70 hrs.
07/17/2007	RBV	Prepared Certificate of Service for discovery and correspondence to clerk filing	0.20 hrs.
07/17/2007	RBV	Receipt and review interrogatories and request for production sent by 3rd party defendant to plaintiff and separate set to Wal Mart	0.60 hrs.
07/18/2007	RCS	Preparation of correspondence to Geanelle Adams re depo of Plaintiff	0.20 hrs.
07/20/2007	RBV	Receipt and review correspondence from counsel for Public Payphone with reservations of rights letter for defense/indemnity claims of Wal Mart	0.30 hrs.

07/20/2007	RBV	Correspondence to counsel for Public Payphone for production of previous discovery and documents requests	0.30 hrs.
07/20/2007	RBV	Instructions to paralegal re depositions of employee-witnesses and settings	0.20 hrs.
07/23/2007	RCS	Telephone call to attorney for Plaintiff re Tracy Nance identity	0.10 hrs.
07/23/2007	RCS	Telephone call to Pearlie Simpson at Store 347 re depositions of Walker, Fulton, Johnson, Spell and Nance	0.20 hrs.
07/23/2007	RCS	Working on arrangements for employee depositions	0.30 hrs.
07/23/2007	RCS	Telephone call to Steve Evilsizor re availability for deposition	0.20 hrs.
07/24/2007	RCS	Telephone call to Steve Evilsizor re deposition	0.20 hrs.
07/24/2007	RCS	Telephone call to counsel for Plaintiff re deposition of WMT employees	0.30 hrs.
07/24/2007	RCS	Review of file materials and begin preparing draft of Defendant's responses to Third Party Defendant's interrogatories and requests for production of documents	2.50 hrs.
07/31/2007	RCS	Voice mail from Plaintiff's counsel re: deposition	0.10 hrs.
07/31/2007	RCS	Telephone call to attorney for Plaintiff re depos of Wal-Mart employees	0.20 hrs.
07/31/2007	RCS	Telephone call to attorney Carmody re depositions of Wal-Mart employees	0.20 hrs.
			\$1,396.00

EXPENSES

07/16/2007	33 Copies at \$.08 a Copy	2.64
07/20/2007	71 Copies at \$.08 a Copy	5.68
		\$8.32

FEE SUMMARY

Virden, Robert B.	7.10 hrs. @	140.00	994.00
Satterfield, Regina C.	6.70 hrs. @	60.00	402.00
	13.80		\$1,396.00

Billing Summary

Total professional services	\$1,396.00
Total expenses incurred	\$8.32

Total of new charges for this invoice	\$1,404.32

Total balance now due	\$1,404.32

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

July 10, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 30025 RBV
Our file# 030650 06451
Billing through 06/30/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

06/11/2007	RBV	Receipt and review certified notice of service upon Third Party Defendant	0.20 hrs.
06/12/2007	RBV	Telephone conference with counsel for 3rd Party Defendant, background claim, alleged damages and issues for discovery	0.40 hrs.
06/15/2007	RBV	Telephone conference with clerk re issuance of summons electronically and need to re-stamp with agreement other counsel	0.20 hrs.
06/19/2007	RBV	Telephone conference with counsel for Third Party Defendant re answer and summons issue from clerk	0.20 hrs.
06/19/2007	RBV	Correspondence to clerk re issuance of summons and no objection from third party defendants	0.20 hrs.
06/21/2007	RBV	Receipt and review correspondence from 3rd Party counsel re delay in answer	0.10 hrs.
06/21/2007	RBV	Receipt and review Motion for Extension to Answer and Agreed Order submitted to Judge Bogen by 3rd Party defendants	0.30 hrs.
06/25/2007	RBV	Receipt and review motion to transfer venue from plaintiff	0.60 hrs.

06/25/2007	RBV	Receipt and review medical records from	0.50 hrs.
06/25/2007	RCS	Update medical records index of Plaintiff	0.30 hrs.
06/26/2007	RBV	Prepared draft response to Plaintiff's motion to transfer venue	2.40 hrs.
06/26/2007	RBV	Prepared interrogatories and request for production to 3rd party defendant	0.80 hrs.
06/26/2007	RBV	Correspondence to all counsel re deposition of plaintiff	0.20 hrs.
06/26/2007	RBV	Revised response in opposition to motion to transfer	0.50 hrs.
06/26/2007	RBV	Prepared Certificate of Service for response to motion and correspondence to clerk filing	0.20 hrs.
06/28/2007	RBV	Revised discovery propounded to 3rd party defendant	0.70 hrs.
			\$1,068.00

EXPENSES

06/15/2007	Greenwood Leflore Hospital - Medical Records	55.00
06/26/2007	Long Distance Telephone Call 601-713-2049	0.22
		\$55.22

FEE SUMMARY

Virden, Robert B.	7.50 hrs. @	140.00	1,050.00
Satterfield, Regina C.	0.30 hrs. @	60.00	18.00
	7.80		\$1,068.00

Billing Summary

Total professional services	\$1,068.00
Total expenses incurred	\$55.22

Total of new charges for this invoice	\$1,123.22
Plus net balance forward	\$1,887.07

Total balance now due

\$3,010.29

CAMPBELL DeLONG, LLP
923 Washington Avenue
P. O. Box 1856
Greenville, MS 38702-1856
TAX ID#: 64-0303636

June 19, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 29929 RBV
Our file# 030650 06451
Billing through 05/31/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

04/30/2007	RBV	Report from paralegal re status of request for Vendor Agreement and further instructions LDWjr for motion for 3rd party complaint	0.30 hrs.
05/02/2007	DW	Draft motion for leave to file third party complaint, and begin drafting third party complaint to be attached to motion.	1.60 hrs.
05/03/2007	DW	Draft proposed Third Party Complaint.	3.20 hrs.
05/11/2007	DW	Complete drafting of Motion for leave to file Third Party Complaint against Public Payphone Company and proposed Third Party Complaint.	1.40 hrs.
05/14/2007	RBV	Finalized motion for leave to file third party complaint and third party complaint itself	0.80 hrs.
05/14/2007	RBV	Prepared certificate of service and correspondence filing motion for leave to file third party complaint via federal electronic docket	0.20 hrs.
05/14/2007	RBV	Prepared summons and service for third party defendants	0.40 hrs.
05/14/2007	RBV	Revised Motion for Leave to file Third Party Complaint	1.40 hrs.

030650

Wal-Mart Stores, Inc.

Invoice# 29929

Page 2

05/14/2007	RBV	Revised Third Party Complaint drafted by LDWjr and incorporated additional parties	1.80 hrs.
05/15/2007	RBV	Receipt and review correspondence from Dr Lucas with notice of no records for claimant	0.10 hrs.
05/15/2007	RBV	Receipt and review disability claim records from Social Security Administration	1.20 hrs.
05/22/2007	RBV	Receipt and review medical records from Bolivar Medical Center	0.40 hrs.
05/23/2007	RCS	Update medical records notebook of Plaintiff	0.20 hrs.
05/24/2007	RBV	Receipt and review order granting motion for leave to file third party complaint	0.20 hrs.
05/25/2007	RBV	Prepared summons to Third party Defendants in separate jurisdiction and arrangements for personal service in Jefferson Parish, LA with correspondence to confirm	0.50 hrs.
05/25/2007	RBV	Correspondence to clerk filing Third Party Complaint	0.10 hrs.
			\$1,730.00

EXPENSES

05/15/2007	Social Security Administration - Copies of Records	43.55
05/25/2007	19 Copies at \$.08 a Copy	1.52
05/25/2007	Jefferson Parish Sheriff's Department - Service of Process Fees	90.00
05/25/2007	Hunter Medical Systems, Inc. - Medical Records from Bolivar Medical Center	22.00
		\$157.07

FEE SUMMARY

Virden, Robert B.	7.40 hrs. @	140.00	1,036.00
Wade Jr., L. Douglas	6.20 hrs. @	110.00	682.00
Satterfield, Regina C.	0.20 hrs. @	60.00	12.00
	13.80		\$1,730.00

Billing Summary

Total professional services	\$1,730.00
Total expenses incurred	\$157.07

Total of new charges for this invoice	\$1,887.07

Total balance now due	\$1,887.07

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

May 9, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 29763 RBV
Our file# 030650 06451
Billing through 04/30/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

03/07/2007	RCS	Receipt of executed signature page from store manager Luvell Watson	0.10 hrs.
03/08/2007	RBV	Execution and approval of discovery responses for filing	0.20 hrs.
03/08/2007	RCS	Electronically file notice of service of discovery with clerk of court	0.20 hrs.
03/08/2007	RCS	Preparation of correspondence to counsel for Plaintiff transmitting discovery responses and compile enclosures	0.40 hrs.
03/12/2007	RBV	Receipt and review plaintiff's responses to interrogatories and request for production	0.70 hrs.
03/12/2007	RBV	Receipt and review correspondence from plaintiff's counsel with deposition of plaintiff and unusual request for Defendant depositions with reply	0.30 hrs.
03/12/2007	RBV	Prepared medical records request to Dr Donahoe, Indianola Clinic, and University Hospitals	0.40 hrs.
03/12/2007	RBV	Correspondence to Social Security Administration re records of plaintiff	0.20 hrs.
03/19/2007	RCS	Internet search for information and location re "Dr.	0.30 hrs.

Sleshington" - information located for Dr. Schlessinger

03/21/2007	RCS	Compile medical records index for Plaintiff	0.30 hrs.
03/27/2007	RBV	Receipt and review medical records of Dr Donahoe	1.30 hrs.
03/28/2007	RCS	Update medical records index of Plaintiff	0.30 hrs.
03/30/2007	RBV	Receipt and review plaintiff's supplemental responses to discovery and document production supplementation	0.60 hrs.
03/30/2007	RBV	Correspondence Plaintiff's counsel re third party complaint, deposition delays and response for request for discovery supplementation	0.50 hrs.
03/30/2007	RBV	Instructions to LDWjr for Motion to Add Party, third party complaint and motion for leave to amend	0.80 hrs.
04/05/2007	RBV	Conducted telephonic case management conference with Judge Bogen	0.50 hrs.
04/05/2007	RBV	Preperations for case management conference with Magistrate Bogen	0.50 hrs.
04/10/2007	RBV	Receipt and review entry from Magistrate Bogen confirming conference	0.10 hrs.
04/10/2007	RBV	Receipt and review Case Management Order, trial setting and instructions to paralegal for update on case management report	0.40 hrs.
04/10/2007	RCS	E-mail to Wal-Mart Legal re vendor agreement	0.10 hrs.
04/10/2007	RCS	E-mail to Clarence Richard and Catherine Kanthak re vendor agreement	0.20 hrs.
04/10/2007	RCS	Review of file materials in preparation for drafting CMR	0.50 hrs.
04/11/2007	RBV	Receipt and review Order from Judge Mills for trial setting and pretrial	0.20 hrs.
04/11/2007	RCS	Preparation of draft of Case Management Report	0.80 hrs.

04/11/2007	RCS	Correspondence from Wal-Mart legal re vendor agreement	0.10 hrs.
04/12/2007	RBV	Updated case management report from paralegal draft	1.20 hrs.
04/12/2007	RCS	Update medical records notebook of Plaintiff	0.20 hrs.
04/14/2007	RBV	Receipt and review numerous medical records from South Sunflower County Hospital	1.30 hrs.
04/14/2007	RBV	Receipt and review medical records from University Hospitals	1.20 hrs.
04/19/2007	RCS	Return e-mail to litigation support re lack of vendor agreement	0.10 hrs.
04/23/2007	DW	Receipt and review of e-mail correspondence detailing the steps taken to locate vendor agreement needed to file the third party complaint against public payphone company.	0.20 hrs.
04/23/2007	DW	Working with Regina Satterfield to provide requested information to Wal-Mart legal to identify vendor against whom a third-party complaint will be filed.	0.30 hrs.
04/30/2007	RBV	Report from paralegal re inspection of social security records and additional medical records requests	0.30 hrs.
04/30/2007	DW	Instructions from RBV regarding third party complaint against public payphones.	0.30 hrs.
04/30/2007	DW	Drafting motion to file third party complaint against public payphones.	1.30 hrs.
04/30/2007	RCS	Travel to Greenville office of Social Security Administration and reviewed plaintiff's disability file.	1.80 hrs.
04/30/2007	RCS	Preparation of correspondence to Greenwood Leflore Hospital requesting medical records of Plaintiff via medical authorization	0.20 hrs.
04/30/2007	RCS	Preparation of correspondence to Bolivar Medical Center requesting medical records of Plaintiff via medical authorization	0.20 hrs.

04/30/2007	RCS	Preparation of correspondence to John Lucas, III, MD requesting medical records of Plaintiff via medical authorization	0.20 hrs.
04/30/2007	RCS	Update medical records index of Plaintiff	0.20 hrs.
			\$2,101.00

EXPENSES

03/28/2007	Indianola Family Medical Group - Medical Records	84.00
04/03/2007	SDS - Medical Records from University of MS Medical Center	163.50
04/03/2007	South Sunflower County Hospital - Medical Records	162.50
		\$410.00

FEE SUMMARY

Virden, Robert B.	10.70 hrs. @	140.00	1,498.00
Wade Jr., L. Douglas	2.10 hrs. @	110.00	231.00
Satterfield, Regina C.	6.20 hrs. @	60.00	372.00
	19.00		\$2,101.00

Billing Summary

Total professional services	\$2,101.00
Total expenses incurred	\$410.00

Total of new charges for this invoice	\$2,511.00

Total balance now due	\$2,511.00

March 20, 2007

Wal-Mart Stores, Inc.
ELECTRONIC BILLING
ELECTRONIC BILLING
ELECTRONIC BILLING
Data Cert
ELECTRONIC BILLING

Invoice# 29530 RBV
Our file# 030650 06451
Billing through 02/28/2007

Re: Willie Mae Moore v. Wal-Mart

CLAIM NUMBER: 4951178

PROFESSIONAL SERVICES

02/02/2007	RCS	Telephone call to Pearlie Simpson at Store 341 re photographs;store file materials	0.20 hrs.
02/02/2007	RCS	Continue work on response to Plaintiff's request for production	0.80 hrs.
02/05/2007	RCS	Preparation of Discovery Request Form and e-mail same to litigation support for documents to be produced	0.30 hrs.
02/06/2007	RCS	Telephone call to store manager Luvelle Watson re documentation regarding pay phone	0.20 hrs.
02/06/2007	RCS	Continue work on draft of Defendant's responses to Plaintiff's interrogatories and requests for production of documents	0.60 hrs.
02/07/2007	RCS	Telephone call to Pearlie Simpson at Store 347 re store file materials	0.20 hrs.
02/07/2007	RCS	Telephone call to associate Wanda Foster re incident	0.20 hrs.
02/07/2007	RCS	Compiled documents for responses to Plaintiff's interrogatories and requests for production of documents	2.00 hrs.
02/12/2007	RBV	Review of new documents and photographs produced by	0.50 hrs.

client and revisions to discovery with paralegal

02/12/2007	RBV	Correspondence to Magistrate Judge with draft case management order	0.20 hrs.
02/12/2007	RBV	Prepared Confidential Settlement Memorandum for Magistrate required under local rules	0.70 hrs.
02/12/2007	RCS	Receipt and review store file materials from Store 347	0.40 hrs.
02/12/2007	RCS	E-mail from litigation support re documents responsive to Plaintiff's request for production of documents	0.10 hrs.
02/12/2007	RCS	Telephone call to Moses Spells at Store 347 re facts of incident	0.20 hrs.
02/12/2007	RCS	Telephone call to Frank Johnson at Store 347 re facts of incident	0.20 hrs.
02/12/2007	RCS	Finalized responses to Plaintiff's first set of interrogatories and requests for production of documents	0.60 hrs.
02/13/2007	RBV	Revised responses to plaintiff's interrogatories drafted by paralegal	1.70 hrs.
02/13/2007	RBV	Review and approval of documents necessary for production in response to plaintiff's request	1.30 hrs.
02/13/2007	RCS	Complete draft of discovery responses and compile documents to be produced in response to Plaintiff's requests for production of documents	0.70 hrs.
02/14/2007	RCS	E-mail to litigation support re location of Steve Evilsizor	0.10 hrs.
02/14/2007	RCS	Revise defendant's responses and Plaintiff's interrogatories and requests for production of documents and compile additional documents to be produced	1.00 hrs.
02/14/2007	RCS	Preparation of notice of service of discovery	0.20 hrs.
02/20/2007	RBV	Receipt and review Initial Order and hearing notice for case management conference with Magistrate	0.30 hrs.

02/20/2007	RBV	Correspondence to Judge Bogen to resubmit draft case management plan	0.20 hrs.
02/20/2007	RBV	Correspondence to plaintiff's counsel re deposition of plaintiff	0.20 hrs.
02/20/2007	RCS	Telephone call to attorney for Plaintiff re discovery requests	0.10 hrs.
02/21/2007	RBV	Return travel to Greenville	0.70 hrs.
02/21/2007	RBV	Prepared memorandum to file re facts of store visit and follow-up investigation necessary	0.40 hrs.
02/21/2007	RBV	Travel to Indianola for store visit and meeting with Pearlle Simpson	0.70 hrs.
02/21/2007	RBV	Conducted store visit, inspection of subject phone, photographs and interview with Ms Simpson	1.40 hrs.
02/21/2007	RCS	Receipt and brief review of documents to be produced from Wal-Mart Legal	0.20 hrs.
02/21/2007	RCS	Receipt of e-mail from Wal-Mart legal re vendor agreement	0.10 hrs.
02/21/2007	RCS	Telephone call to Pearlle Simpson at Store 347 re phone inspection and discovery responses	0.20 hrs.
02/21/2007	RCS	Telephone call to Pearlle Simpson re meeting with RBV for phone inspection	0.10 hrs.
02/22/2007	RBV	Receipt and review order for extension on motion to remand response	0.10 hrs.
02/22/2007	RBV	Receipt and review documents necessary for production including new photographs and documents from Wal Mart Legal	2.30 hrs.
02/22/2007	RBV	Review and approval of final documents and items necessary for production and revisions to paralegal to finalize	1.30 hrs.

02/22/2007	RCS	Receipt of e-mail from Wal-Mart legal re whereabouts of Store Manager Steve Evilsizor	0.20 hrs.
02/22/2007	RCS	Revise defendant's responses to Plaintiff's first set of interrogatories and requests for production of documents	0.40 hrs.
02/22/2007	RCS	Preparation of correspondence via facsimile to Pearlie Simpson re execution of interrogatory responses	0.20 hrs.
02/23/2007	MSF	Prepare copies of photos of telephone for production to opposite counsel and for use in discovery.	1.10 hrs.
02/27/2007	RCS	Telephone call to Pearlie Simpson at Store 347 re status of execution of discovery responses	0.20 hrs.
02/27/2007	RCS	Re-fax discovery responses to Store 347 for execution	0.10 hrs.
02/28/2007	RCS	E-mail from counsel for Plaintiff re discovery requests	0.10 hrs.
			\$2,340.00

EXPENSES

02/21/2007	50 Miles to Indianola, MS at \$.485 a Mile	24.25
		\$24.25

FEE SUMMARY

Virden, Robert B.	12.00 hrs. @	140.00	1,680.00
Satterfield, Regina C.	9.90 hrs. @	60.00	594.00
Flowers, Melanie S.	1.10 hrs. @	60.00	66.00
	23.00		\$2,340.00

Billing Summary

Total professional services	\$2,340.00
Total expenses incurred	\$24.25

Total of new charges for this invoice	\$2,364.25

Total balance now due

\$2,364.25

CAMPBELL DeLONG, LLP

923 Washington Avenue

P. O. Box 1856

Greenville, MS 38702-1856

TAX ID#: 64-0303636

February 8, 2007

Wal-Mart Stores, Inc.

ELECTRONIC BILLING

ELECTRONIC BILLING

ELECTRONIC BILLING

Data Cert

ELECTRONIC BILLING

Invoice# 29333 RBV

Our file# 030650 06451

Billing through 01/31/2007

Re: Willie Mae Moore vs Wal Mart; personal injury

CLAIM NUMBER: 2006-32359

PROFESSIONAL SERVICES

12/21/2006	RBV	Prepared Removal Notice, documents and Answer	1.70 hrs.
12/21/2006	RBV	Prepared draft interrogatories and request for production of documents	0.80 hrs.
12/21/2006	RBV	Correspondence to Mr Richard confirming representation and removal/answer	0.20 hrs.
12/21/2006	RBV	Receipt and review correspondence and new lawsuit/complaint from Ashleigh Johnson and Catherine Kanthak	0.40 hrs.
12/26/2006	RBV	Receipt and review correspondence and CMI file from Ms Laforge	1.40 hrs.
12/26/2006	RBV	Revised answer, removal documents and initial discovery	1.20 hrs.
01/02/2007	RBV	Revised answer with inclusion of Rule 19 defenses and punitive damages defenses	0.40 hrs.
01/04/2007	RBV	Receipt and review initial orders from federal court with case assignment, recusal and re-assignment to Oxford District Judge Mills	0.40 hrs.

01/04/2007	RBV	Receipt and review correspondence from claimant's counsel requesting oral argument for appeal and instructions to paralegal to set	0.30 hrs.
01/08/2007	RBV	Receipt and review certification and receipt notice from Sunflower Circuit Clerk with filing to federal court	0.30 hrs.
01/08/2007	RBV	Prepared draft Core Disclosures under federal local rules	0.80 hrs.
01/12/2007	RBV	Prepared draft pre-discovery core disclosures and document production for filing	1.20 hrs.
01/12/2007	RBV	Prepared draft Case Management Order under local rules with correspondence to plaintiff's counsel	0.40 hrs.
01/15/2007	RBV	Prepared draft Case Management Report, Summary and Budget	2.20 hrs.
01/18/2007	RBV	Conducted attorney's conference required under local rules for initial disclosures and status	0.80 hrs.
01/18/2007	RBV	Revised draft Case Management Plan with correspondence to plaintiff's counsel for approval and review	0.40 hrs.
01/18/2007	RBV	Finalized Prediscovery core disclosures and correspondence to clerk filing with certificate of service	0.70 hrs.
01/18/2007	RBV	Extended telephone conference with Rob Schmidt with Public Pay Phone Co re incident, lawsuit, investigation and request for indemnity	0.40 hrs.
01/18/2007	RBV	Separate correspondence to Public Payphone requesting investigation materials and demand for defense/indemnity	0.30 hrs.
01/18/2007	RBV	Correspondence to Mr Richard re Vendor Agreement and defense/indemnity	0.20 hrs.
01/18/2007	RBV	Revised Case Management Report and Budget with additional third party information	0.50 hrs.
01/18/2007	RBV	Finalized interrogatories and request for production to plaintiff with certificate of service and filing	0.50 hrs.

01/18/2007	RBV	Prepared Corporate Disclosure Statement required under Local Rules	0.20 hrs.
01/18/2007	RBV	Telephone conference with plaintiff's counsel for deposition of plaintiff and employee-witnesses	0.20 hrs.
01/25/2007	RBV	Receipt and review plaintiff's pre-discovery core disclosures	0.70 hrs.
01/25/2007	RBV	Receipt and review plaintiff's interrogatories and request for production with instructions to paralegal for draft responses	0.60 hrs.
01/31/2007	RCS	Review file materials in preparation for drafting responses to Plaintiff's interrogatories and requests for production of documents	0.70 hrs.
01/31/2007	RCS	Begin drafting responses to Plaintiff's interrogatories and requests for production of documents	1.60 hrs.
			\$2,546.00

EXPENSES

01/03/2007	24 Copies at \$.08 a Copy	1.92
01/03/2007	Clerk, U.S. District Court - Court Costs for Removal to Federal Court	350.00
01/18/2007	Long Distance Telephone Call 504-838-9702	3.08
01/19/2007	14 Copies at \$.08 a Copy	1.12
01/30/2007	13 Copies at \$.08 a Copy	1.04
		\$357.16

FEE SUMMARY

Virden, Robert B.	17.20 hrs. @	140.00	2,408.00
Satterfield, Regina C.	2.30 hrs. @	60.00	138.00
		19.50	\$2,546.00

Billing Summary

Total professional services	\$2,546.00
Total expenses incurred	\$357.16

Total of new charges for this invoice	\$2,903.16

Total balance now due	\$2,903.16